

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	C Norris Springs Ltd	Site Address:	Land at C Norris Springs Ltd, Lady House Works, Newhey Road, Milnrow, Rochdale, OL16 4JD
National Grid Reference:	E: 392954 N: 412298		
Site Ref Number:	CS 30924800	Site Type: ¹	Macro

2. Pre Application Check List

Site Selection (for New Sites only)

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why:		
No publicly accessible mast register to view		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	27.04.2026
Name of contact:	Majid Mir

¹ Macro or Micro

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Summary of outcome/Main issues raised:

A paid pre-application service was submitted to the Council on 05.03.2026 to Rochdale Metropolitan Borough Council, with a copy of a pre-application letter and a copy of the plans.

A response was received from the planning officer on 27.04.26, detailing the Council's view on the submission. In summary the LPA requested for further information on the following points:

- Further information on why a mast near the motorway service station would not work
- Details of why a shared mast is not possible
- Consideration to alternative locations within the industrial estate and Newhey Road
- Details of the colour of the mast should be provided.

The applicant has reviewed these points with the customer (Virgin Media O2) and confirmed the following:

- The mast cant be located any further away because not only would it be outside the search area but it would mean only one out of the three sectors would actually be targeting the coverage area. Given this is replacing an existing radio base station for two different operators, the site needs to be located as closely as possible to the existing site to replicate that existing coverage, whilst providing the latest 5G technologies. The site has been chosen from a tehcnical perspective as it is near to the existing site and relatively central to the operators search area, allowing for all 3 sectors to reach the target coverage area. This site would provide important suburban coverage as well as Motorway coverage. The placement allows for 3 sectors to be efficiently used for both these targets.
- The mast will be shared with VodafoneThree, allowing for two different operators to share the same equipment and provide service provision for both MNO's and MNVO's.
- The applicant has reviewed the previous location with the site provider and moved the site to the other side of the entrance. The yard is a busy, working yard with heavy good vehicles entering and exiting the site daily, work operatives working in the yard, with storage areas for various materials and suppliers, all of which need to be separated from each other for health and safety reasons. This has dictated the siting of the mast from this perspective. Therefore, anywhere else within the yard would not be agreeable with the site provider.

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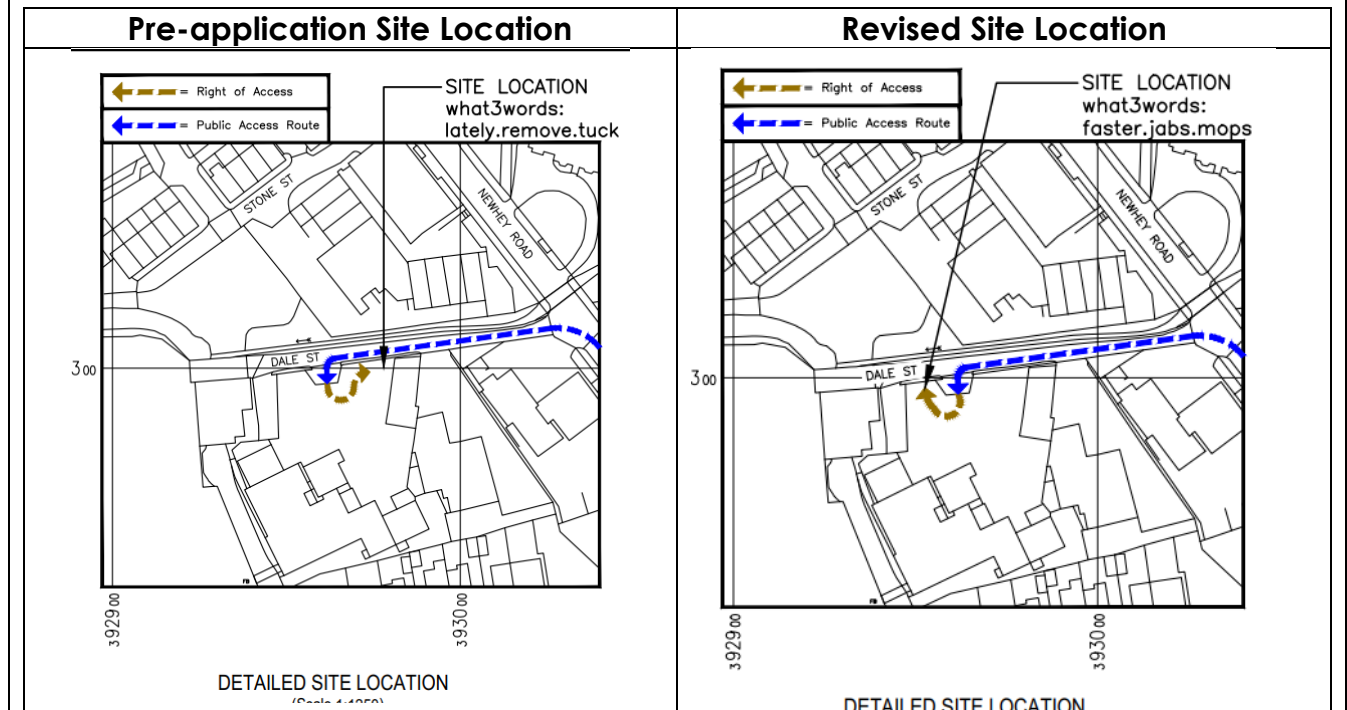
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- The mast will be coloured galvanised to blend in with the often grey sky and the industrial nature in which the mast sits.



Annual area wide information to planning authority

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

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Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out:			
A copy of pre-application consultation letters and site plans were sent to the local ward councillors for Milnrow & Newhey ward (Cllrs I Davidson, D Bamford and A Kelly) and the local MP Paul Waugh via email on 28/04/2026.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No comments received to date			

School/College

Location of site in relation to school/college (include name of school/college):	
Brookland School, 13 Newhey Rd, Milnrow, Rochdale, OL16 3NP Tiddlywinks Nursery Group, Milnrow, 21 Stonefield Street, Milnrow, Rochdale, OL16 4JQ	
Outline of consultation carried out with school/college (include evidence of consultation):	
A copy of pre-application consultation letters and site plans were sent to the headteacher and chair of Governors for Brookland School via email on 28/04/2026.	
A copy of pre-application consultation letters and site plans were sent to the manager for Tiddlywinks Nursery Group via email on 28/04/2026.	
Summary of outcome/main issues raised (include copies of main correspondence):	
No comments received to date	

Civil Aviation Authority/Secretary of State for Defence or the operator of the civil safeguarding area or defence safeguarding area notification (only required for an application for prior approval)

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

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Details of response:

N/A

Developer's Notice

Copy of Developer's Notice enclosed?	Yes
Date served:	Developer's notice, covering letter and site plans were sent to the landowner on 02/07/2026 via email. Notice and proof of delivery attached as part of this application.

3. Proposed Development

The proposed site:

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

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

As part of Cornerstone's network improvement programme, VMO2 is in the process of progressing a number of suitable sites for radio base stations, which will provide improved 4G coverage and new 5G service provision. This is fully in line with the Government's aim to ensure that everyone is connected to the superhighway.

Cornerstone and VMO2 are in the process of progressing a new suitable site in this area for a radio base station to improve existing levels of service provision. The site needs to provide new coverage and capacity to ensure that customers continue to experience access to the latest service provision of 4G coverage and capacity, and new 5G coverage. The proposed new mast installation will also meet the extra demands on the network in this area as new technologies improve.

Capacity refers to the maximum amount of data a network can handle and the number of devices it can support simultaneously. When too many devices try to connect to the network, it can become overloaded, leading to issues like slow internet speeds and dropped calls. This is similar to a highway getting congested when there are too many cars. Even if there is coverage in the area, the network will not operate properly if there are issues with capacity. This means that while your

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device may show a strong signal, the network can still struggle to deliver fast and reliable service if it is unable to manage the high demand. A new installation in this location will allow to provide improved coverage to this area, as well as to improve capacity on the operator's network.

3G (and eventually 2G) has now been switched off by the operators in order to repurpose these radio frequencies for faster more energy-efficient 4G and 5G services. 3G was primarily used for mobile data services. It has been switched off first because it has already largely been superseded by 4G. Hence the importance of providing the latest 4G and new 5G service provision is areas where there is no such coverage. As a result, it is imperative that the operator builds resilience into the network.

As part of VMO2's continues network improvement program, there is a specific requirement for a new installation at this location to provide replacement 4G coverage, and new 5G coverage ensuring that this area of Milnrow has access to the latest technologies.

Planning History:

The applicant has attempted to upgrade the existing radio base station in recent years, as set out below. Due to the sites location within Butterworth Hall (municipal buildings) conservation area and adjacent to Butterworth Hall conservation area, along with being located on a non-designated heritage asset, the planning authority and heritage officer were not convinced the existing site was the least harmful option.

21/01474/FUL – Full planning submitted for the upgrade to existing radio base station at Albert Mill, No. 34 Newhey Road, Milnrow, Rochdale, OL16 3NR, NGR E: 393065 N: 412237

- The removal of 6 no. antennas and ancillary development including 3 no. Glass Reinforced Plastic (GRP) Shrouds, Remote Radio Units (RRUs) and steel support grillage and the installation of 6 no. replacement antennas and 6 no. new antennas fixed to 3 no. tripod frames and ancillary development thereto including Remote Radio Units.
- Full planning application was submitted but never validated. The applicant withdrawn the site in order to submit planning with a heritage statement and to incorporate Glass Reinforced Plastic onto the rooftop.

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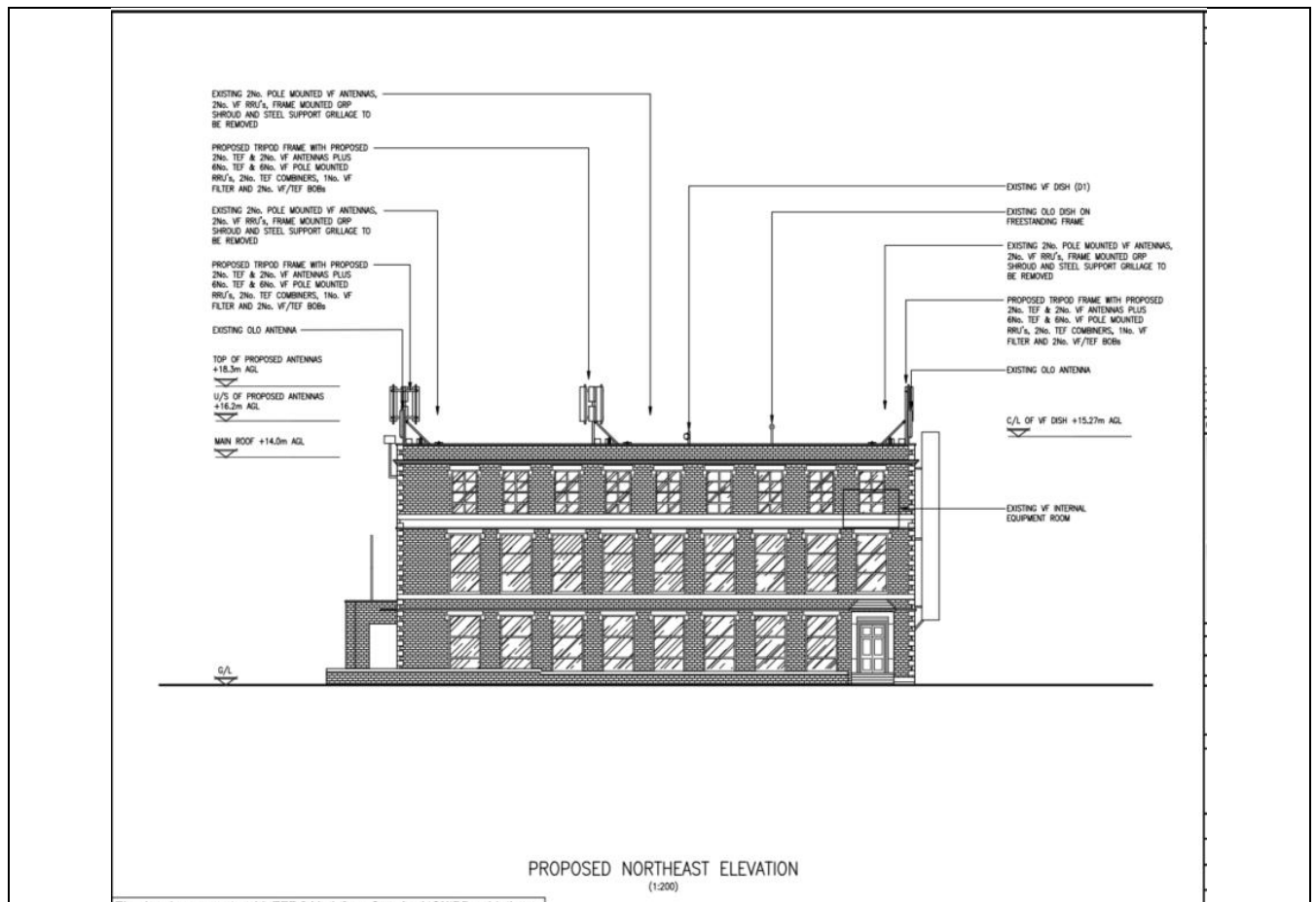


Figure 1: Proposed North East Elevation plans submitted under LPA ref: 21/01474/FUL

23/01026/FUL - Full planning submitted for the upgrade to existing radio base station at Albert Mill, No. 34 Newhey Road, Milnrow, Rochdale, OL16 3NR, NGR E: 393065 N: 412237

- The removal of 6 no. antennas and ancillary development including 3 no. Glass Reinforced Plastic (GRP) Shrouds, Remote Radio Units (RRUs) and steel support grillage and the installation of 6 no. replacement antennas and 6 no. new antennas contained within a GRP shroud and ancillary development thereto including RRUs.
- Full planning application was submitted on 19/08/2022 and validated on 12 October 2023.
- Concerns were raised about the size, siting and covering of the shroud, having a negative impact on the non-designated heritage asset and the Conservation Area.
- The application was subsequently withdrawn after discussions with the planning authority determined an application would not be supported.

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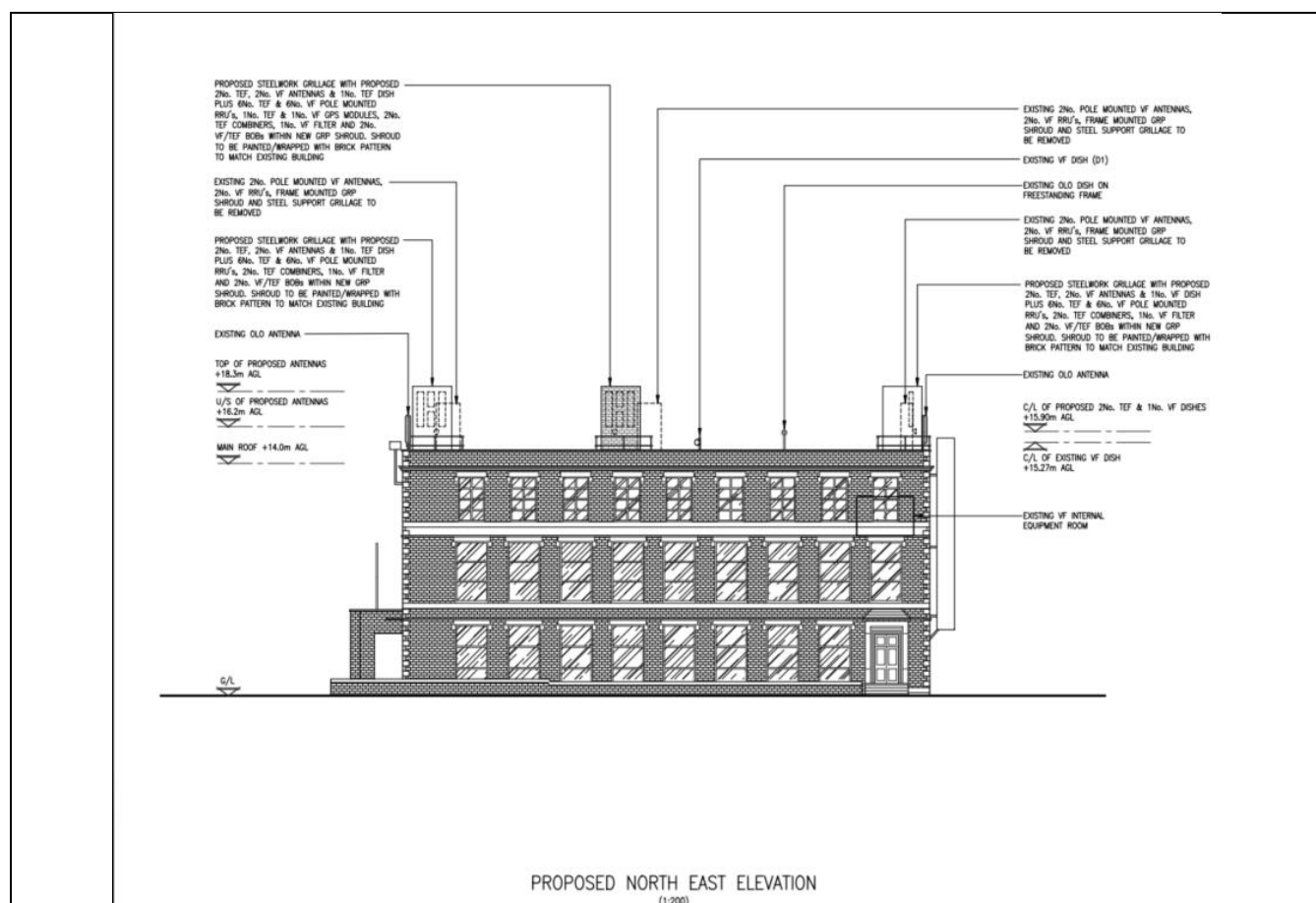


Figure 2: Proposed North East Elevation plans submitted under LPA ref: 23/01026/FUL

This proposal is to replace the existing radio base station located on Albert Mill detailed above. The proposed mast will support two operators' equipment (namely VMO2 and VodafoneThree), improving both coverage and capacity to this area of Milnrow.

The existing equipment on Albert Mill will be removed once this site becomes operational.

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

The installation of this ground-based installation will enable enhanced 4G and new 5G coverage and capacity to the surrounding area for the operators to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

The proposed location and height will allow for the optimum level of coverage and capacity to be provided to the target coverage area. The levels of high-quality, reliable 4G and 5G coverage that will be provided to this area is significant. As more people require mobile access for phone calls and mobile internet at once. Increasing

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the capacity of the network will ensure more people are able to use their phones at the same time whilst reducing the risk of calls dropping, internet buffering etc.

When 'Capacity' is exceeded, although 'Coverage' remains present, the base station cannot provide service to any further users and calls/text/data usage would be unavailable. This is contrary to the purposes in which the operator's customers purchased their handheld devices as well as the Government's latest thinking that everyone should have access to the information superhighway wherever they are. Capacity is the maximum data or calls that can be processed by a base station.

Therefore, without this installation, the area would continue be detrimentally affected as they continue to try to serve a much larger demand. The result would be constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses and visitors to the area.

Type of Structure (e.g. tower, mast, etc): lattice tower	
Description:	
The installation of a 20m lattice tower with an open headframe supporting, 12 no. antennas, 4 no. 0.3m transmission dishes, along with 2 no. equipment cabinets, 1 no. electric meter cabinet and ancillary development thereto including 30 no. Ericsson Radio Systems (ERS's), contained within a 2m high palisade fence.	
Overall Height: 20m	
Height of existing building (where applicable):	N/A
Equipment Housing: CSC cabinet	
Length:	0.660 Metres
Width:	0.800 Metres
Height:	1.770 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel – galvanised
Equipment housing – type of material and external colour:	Steel – Grey

Reasons for choice of design, making reference to pre-application responses:
The applicant has adopted a sequential approach to site selection, however no existing base stations or structures were suitable, available and deliverable as detailed in Section 5 and above in the planning history of the site. The design of the proposed equipment is considered to be the least visually intrusive option available given the level of equipment required for 5G (see additional supporting statement– 5G Explanatory Note).

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The operator has carefully considered the design of the proposed mast. A lattice tower is the most suitable design from a technical viewpoint. Such a design is also able to facilitate greater coverage (as they give better scope for antenna orientation) and provide the structural capability required to be able to support the weight and size of the operators' telecommunications equipment. Due to the slim line nature of the supporting struts of the lattice frame, light is able to continue to pass through the structure. If the lattice tower were to be any slimmer in width, then it would not be structurally capable of supporting the operators' equipment or meet the wind loading requirements in this rural location. The colour of the tower is proposed to be Galvanised to blend in with the typically grey British skyline. However, it can be coloured any other colour that the authority considers appropriate.

The site is to be shared by two different operators (namely VMO2 and VodafoneThree), each have their own radio frequencies and requirements. The open headframe is required to support these technologies and the orientations of each operators antenna bearings. If the operators were not able to have a clear separation between their antennas it would cause interference and fail their design brief.

Both operators currently occupy Albert Mill and both are looking to share a mast. It has been confirmed both operators will remove their equipment off the rooftop once this site becomes operational. As a result, they need to replicate the number of antennas currently on the rooftop, whilst providing the latest technologies for each operator, resulting in additional antennas required to handle coverage and capacity. Both operators are looking to provide equivalent coverage as each other, therefore the number of antennas can't be reduced without affecting the radio signal. Given both customers are well established in the area and they are looking to replicate the coverage opportunities, both operators require 6 antennas each to provide equal coverage and capacity opportunities to their customer bases.

The top height of the antennas will be at 20m in order to clear the surrounding tree line. The antennas cannot be reduced in height as this would prevent them from reaching their target coverage area. There are mature trees to the east and west of the site in which the site need's to reach over. Otherwise, existing customers would have a poor user experience if the installation were to be reduced in height, with buffering and dropped calls becoming a significant issue.

It is important to remember, the height of the existing building that currently hosts the telecommunications equipment is 14m in height, with the antennas previously proposed to be at a top height of 18.3m. The natural clutter surrounding the building was less compared to this site and it was on slightly higher land. This all effects radio propagation and results in a taller mast required to reach the target coverage area.

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The latest 5G radio technologies operate in higher frequency bands than older technologies. Since it operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater it will normally require a higher structure to achieve the same coverage footprint. To increase capacity and data speeds to the user, the antenna will normally need to be mounted higher than conventional antennae. These factors drive a requirement for new slightly larger antennas to provide the latest 4G and 5G technology.

The antennas are proposed to remain open and not shielded as this provides the optimal service provision to the surrounding area. If the antennas were to be shrouded, they would not be as efficient at providing the latest technologies to this cell area. Thus, an additional installation would likely to be required in this cell area which would lead to the proliferation of masts contrary to the NPPF. Given the site's location within a light industrial area, set away from any residential properties, and set back off Newhey Road, this loss in service provision if the antennas were to be shielded, would not be justified. As such, the proposed radio base station has been designed to provide the latest high quality, reliable service provision to this area of Milnrow.

It is also proposed to install ERS. These aspects of the proposal fall within the remit of 'ancillary development' and do not require permission in their own right. They are small for telecommunications apparatus, approximately the size of a shoe box. They are designed to act like a booster to make the antennas more efficient and reduce the amount and size of equipment cabinets at ground level. They further reduce the overall amount of apparatus required at this radio base station minimising the visual impact on the area. Given this site's location set well away from the main road, located within a light industrial setting, coupled with the position of the ERSs behind the antennas it ensures that this ancillary development to the existing installation will not appear over prominent in the surrounding area.

The new transmission dishes will also be located below the antenna headframe at a centre line height of 22m. This will have no impact on the surrounding area considering the height on which they are located and their size, 4 no. 300mm dishes at 16.5m. The dishes will provide a link into the network. A clear line of sight is required in order for them to meet their design brief.

The equipment cabinets are designed to appear like other statutory undertakers' equipment cabinets. They are small for telecommunications apparatus and are proposed to be coloured grey, however they will not be noticeable as they will be shielded by the proposed fence surrounding the site.

A compound is proposed to enclose the entire development for health and safety reasons. It is proposed to utilise a 2m high palisade fence around the boundary of the

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concrete base. This best matches those fences and gates in the immediate vicinity of the proposed site.

It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the operator's technical requirements for the site. Taking all matters into account, it is considered that the benefits of this proposal, to provide improved network coverage and to provide this area with high quality 4G and 5G mobile service provision for two main telecommunications operators utilising the same structure, would outweigh any perceived visual harm to the surrounding area of Milnrow.

Health and Safety - including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below).

International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.

When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.

In order to minimise interference within its own network and with other radio networks, Telefonica UK Ltd operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

As part of Telefonica's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

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The telecommunication infrastructure the subject of this application accords with all relevant legislations and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

4. Technical Justification

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

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

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

There is a specific requirement to install a radio base station at this location to enable and enhance 4G coverage and capacity to this area of Milnrow and to provide new 5G service provision.

Currently, there is a large 'hole' in service provision, which means that the majority of the operator's customers cannot use their handheld devices for the purposes in which they were purchased. This installation will fill this partial gap for VMO2.

The below coverage plots indicate a current lack of 5G service provision in the surrounding area, they also demonstrate a significant improvement (indicated by green colour) in 5G coverage provision in the surrounding area that the proposed radio base station will provide. The proposed installation will also improve 4G coverage and capacity in this part of Denton.

Coverage maps are a useful tool for establishing network coverage in an area. They are developed using assumptions regarding the handset use, expected level of call reliability and signal loss within a vehicle or a building. However, plots only tell part of the story as even when the coverage plots provided show good coverage in an area there may still be a requirement to improve capacity and as such local network

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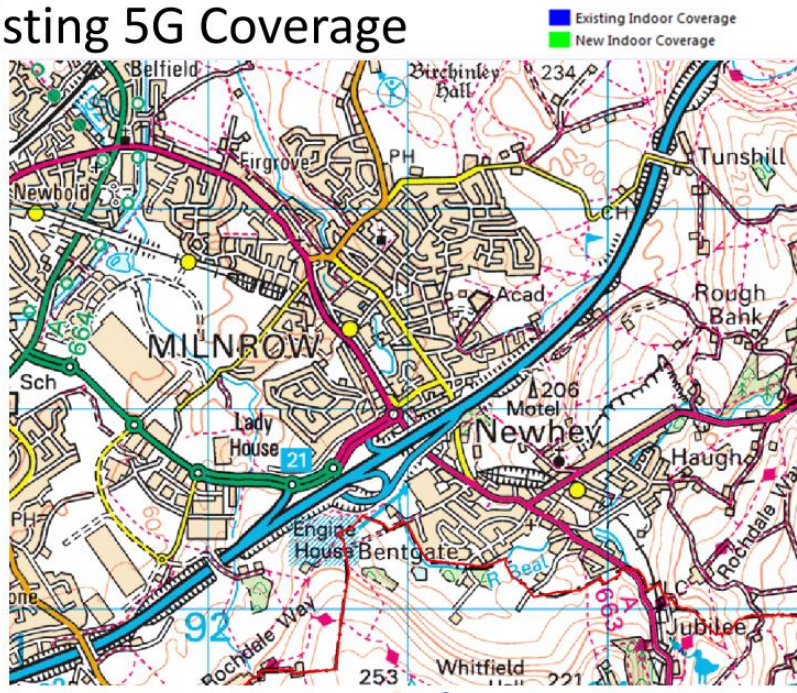
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services. Coverage plots show coverage issues only; they cannot show capacity issues.

Existing 5G Coverage:

Existing 5G Coverage



Proposed 5G Coverage:

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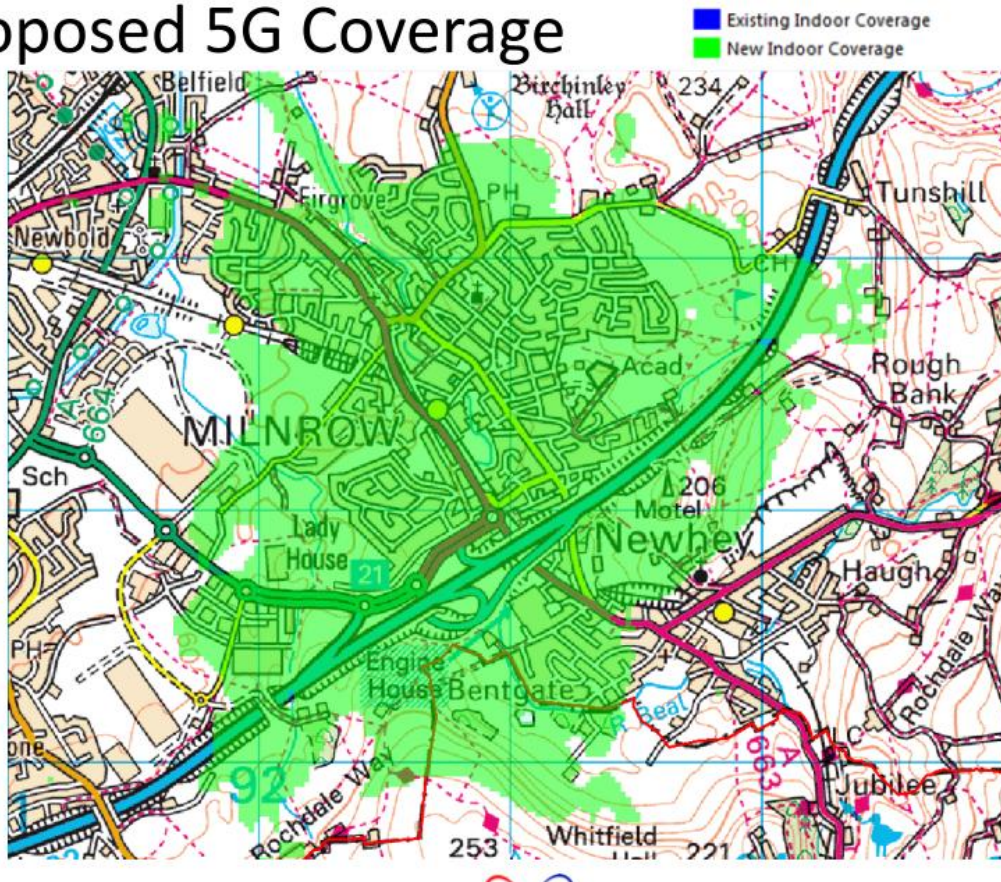
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Proposed 5G Coverage



The above plots show the 5G coverage. However, the site will also provide enhanced 4G coverage to this area. Although the 4G coverage is not shown on the plots, it will follow the 5G footprint, ensuring that 4G coverage will be available in a similar area as the improved 5G coverage. It can be seen there will be a large catchment area of Milnrow including Newhey the south that will benefit from this installation.

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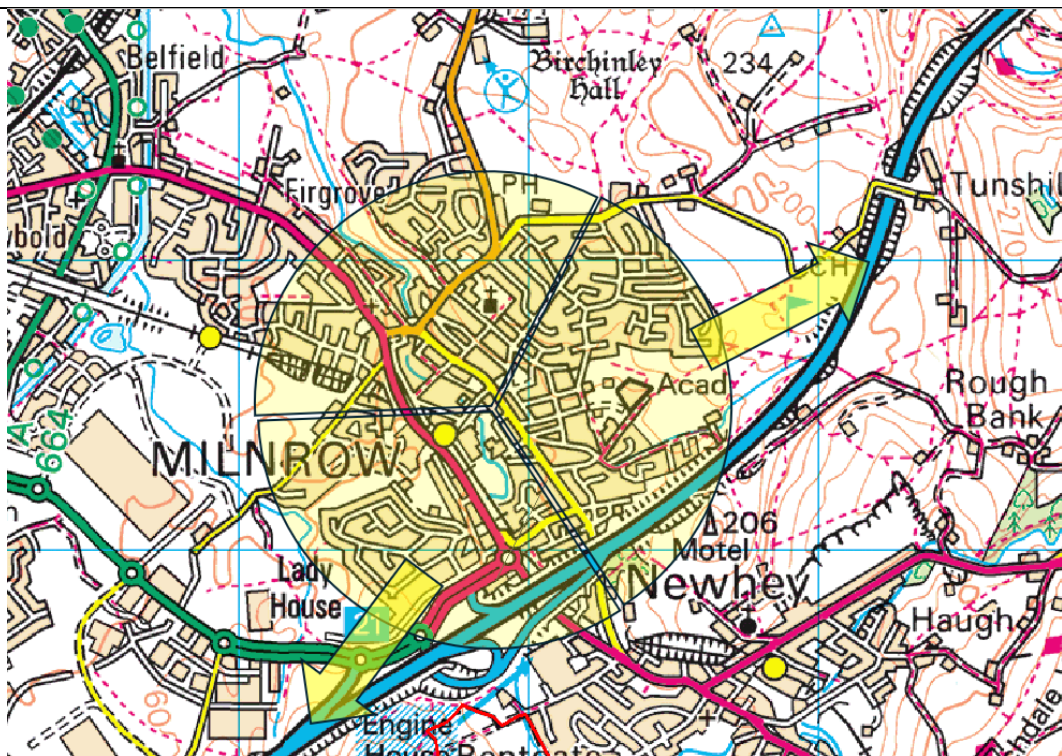


Figure 3: target coverage area for the site

The above map depicts the target coverage area, if the site were to move south, so would the coverage. It would not reach the target coverage area and fail the operators design brief.

Anything outside the search area that has been re-investigated again would simply not work. This cannot be emphasised enough, a site that is too far away from the existing site located at the Albert Mill would simply move the coverage from where it is currently being experienced and users would lose their ability to access the network.

5. Site Selection Process

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

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

- Upgrading their own existing base stations.

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

The applicant has moved the site away from the main road of Newhey Road, outside of the Conservation Area and into a location that is light industrial in nature. The new location for the operators equipment allows for the mast to not appear stark or overly visible along Newhey Road or within the Conservation Area.

In the pre-application response, the case officer requested for further information as to why a site in the south west, located at the National Highways Depot (see blue arrow below on map 1). However, it is not possible to locate a site here, not only is this outside of the operators search area (defined by the yellow polygon), it would result in only one out of the three sectors target the existing coverage area.

The monopole is made up of 3 different sectors, all contributing an orientation that totals 360 degrees. Given this is an existing, well established site, whereby the one of the operator's (VodafoneThree) are looking to replicate and enhance that existing coverage by removing their equipment off the rooftop of Albert Mill (discount 1), it needs to be located as closely as possible to the existing site. Similarly, the other operator (VMO2) are looking to replicate the same level of coverage to allow for a choice to the area. The proposed location is the optimum location, as it is located towards the centre of the search area and located near to the existing site. The LPA suggested location would move this existing coverage and not allow for all three sectors to reach the target coverage area.

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

Discount 1 – Existing telecoms site – Albert Mill, No. 34 Newhey Road, Milnrow, Rochdale, OL16 3NR, NGR E: 393065 N: 412237

Detailed above, two planning applications were submitted to upgrade the existing radio base station (LPA Ref.: - 21/01474/FUL + 23/01026/FUL). These were both subsequently withdrawn due to the concerns raised by the planning authority and heritage officer over the siting and appearance of the proposals, whereby one had

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exposed antennas on new tripod frames (21/01474/FUL / see figure 1 above). The re-submitted proposal replaced the existing a glass reinforced plastic (GRP) with new GRP shielding the views of the antennas (23/01026/FUL / see figure 2 above). These were both viewed negatively from the planning authorities perspective due to their setting within the Butterworth Hall (municipal buildings) conservation area.

Therefore, the applicant is removing their equipment of the existing rooftop and proposing to re-locate their equipment onto a new tower to minimise the effect on the setting of the heritage assets.

Discount 2 – Streetworks – Footway of Newhey Road, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 4JA, NGR E: 392993 N: 412359

Previous proposals to upgrade the existing site have been located within the conservation area. This site is found within the Butterworth Hall conservation area in which Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special attention should be given to the desirability of preserving or enhancing the character and appearance of the relevant Conservation Area. In pursuing the identified site out-with this designation and avoiding so far as practicable the setting of listed buildings found therein, it is felt that on balance the site and proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area, especially with the site history in the area for the applicant whereby council's heritage officer on the siting and appearance of the rooftop proposal at Albert Mill.

Discount 3 – Rooftop - Maqio Toys, Station Rod, Milnrow, Rochdale OL16 4HQ, NGR E: 392835 N: 412304

This location is too far removed from the search area to provide the required level of coverage and capacity in the target coverage area. Thus, an additional base station would be required which would lead to the proliferation of masts contrary to NPPF. The only suitable element of the rooftop is the large steel frame outlined below in figure 4, however the site provider has planning approval to re-development this area. The site provider has planning approval to erect an additional industrial unit and will no longer be available once complete (23/00707/FUL).

The rest of the rooftop is not suitable to host telecommunications equipment. The building has a pitched roof, in which there is nothing for the apparatus to be securely attached to on a sloping roof as significant steelwork and bracing would be required internally to support the equipment. Simply put the building is not suitable from a practical and build perspective given its construction and roof shape.

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Figure 4: location of steel frame on Maqio Toys

Discount 4 – Streetworks – Grassed verge of Elizabethan Way, Milnrow, Rochdale OL16 4EH, NGR various

A radio base station cannot be installed within 50m of a live railway line due to installation and mast maintenance reasons as the line needs to be closed for such works to be carried out which would detrimentally affect users of the railway network.

Discount 5 - Milnrow Library, 57 Newhey Rd, Milnrow, Rochdale OL16 3NP, NGR E: 393156 N: 412177

The property is a Grade II listed building in which given its status Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special regard should be had to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest. It is considered that a proposal on this listed building could compromise this heritage asset and so this option has not been pursued further.

Discount 6 – Greenfield - Car parking area of Platt Close, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 3NL, NGR E: 393118 N: 412427

A site in this location would take up It would need to take up at least two car parking spaces, and these are assigned to the occupants of the flats that the car park it is associated with. This would be unacceptable and there is no other space within the car park to accommodate the mast. It would also be viewed in the context of the residential nature of the area with properties located within Platt Close viewing the site

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from multiple angles. This would not be acceptable when compared to the chosen site that will be viewed in the industrial nature of the area. Therefore, a site in this location has been discounted.

Discount 7 – Greenfield – Car parking area of Charles Lane, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 3NU, NGR E: 393209 N: 412323

A site in this location would be viewed from residential frontages, being located within the context of the residential nature of the area with properties located along Butterworth Hall and Charles Lane viewing the site from different angles. This would not be acceptable when compared to the chosen site that will be viewed in the industrial nature of the area. Therefore, a site in this location has been discounted.

Discount 8 – Streetworks - Ladyhouse Lane, Milnrow, Rochdale, Greater Manchester, OL16 4YB, NGR Various

There are houses fronting both sides of this road, the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Ladyhouse Lane as on balance any scheme would compromise pedestrian movements, access arrangements to properties and impact on highway safety.

Discount 9 – Greenfield – Car parking area of Albert Mill, Newhey Road, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 3NP, NGR E: 393078 N: 412203

Given the height and massing of the neighbouring property (Albert Mill) found next to this site, this built clutter would prevent the effective propagation of radio signals towards the target area as it would block the signal. The building is 14m high and the underside of the antennas needs to be well clear of the rooftop in order to avoid clipping, therefore a minimum of 25m in height would be required in order to reach the target coverage area.

Given a site in this location would be within the Butterworth Hall (municipal buildings) conservation area in which Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 of the Act emphasises that special attention should be given to the desirability of preserving or enhancing the character and appearance of the relevant Conservation Area. In pursuing the identified site out-with this designation and avoiding so far as practicable the setting of listed buildings found therein, it is felt that on balance the site and proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area, especially with the site history in the area for the applicant whereby there were objections from the council's heritage officer on the siting and appearance of the rooftop proposal at Albert Mill.

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Discount 10 – Land within Esso, Newhey Road, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 4JD, NGR E: 393027 N: 412275

Whilst a site in this location would be within the setting of a petrol filling station, whereby it would be located off the main road and viewed in this industrial commercial location, a site would still be located within the Butterworth Hall conservation area. Therefore, on balance it was determined a site that was outside of the conservation area totally, located within a predominantly industrial setting and well away from Newhey Road was deemed more appropriate and therefore a site here has been discounted.

Discount 11 – Greenfield - Land at Waggon Garage, New Street, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 3PE, NGR E: 393142 N: 412283

Given the site's existing use as a goods yard / forecourt car dealership where space is limited anyways with frequent vehicle movements and access arrangements, there is no practical space available to accommodate a ground-based installation of the nature and footprint required. A site in this location would also be located within the Butterworth Hall Conservation Area. The proposal put forward is a more appropriate option to pursue rather than one within the Conservation Area, especially with the site history in the area for the applicant whereby there were objections from the council's heritage officer on the siting and appearance of the rooftop proposal at Albert Mill.

Discount 12 – Rooftop - Brookland School, Newhey Road, Lady House, Milnrow, Rochdale, OL16 3NP, NGR E: 393031 N: 412369

The building has a pitched roof, in which there is nothing for the apparatus to be securely attached to on a sloping roof as significant steelwork and bracing would be required internally to support the equipment. Attaching telecoms development to the roof tiles would not be possible as they would be dragged off by the sheer weight of the equipment and cause the roof to collapse. Simply put the building is not suitable from a practical and build perspective given its construction and roof shape.

Discount 13 – Streetworks – Footway along Charles Lane, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 3NU, NGR Various

There is insufficient space available on this stretch of pavement as the siting and dimensions of a streetworks style mast and its associated equipment cabinets, would restrict pedestrian movements to unacceptable levels and may result in them stepping into the carriageway. Therefore a site here was discounted as it would lead to highway safety concerns.

Discount 14 – Streetworks - Lambourne Grove, Lady House, Milnrow, Rochdale, Greater Manchester, OL16 4YA, NGR various

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There are houses fronting both sides of this road, the pavements are narrow and there are regular driveways and pathways for some of the properties. Given the purely residential setting there are no opportunities to site a streetworks style proposal on Lambourne Grove as on balance any scheme would compromise pedestrian movements, access arrangements to properties, impact on highway safety and have a greater impact on residential visual amenity.

The discounted options are mapped out below with the extent of the search area detailed on the yellow polygon. Technical requirements dictate the siting of the proposed equipment. The operator has spent a considerable amount of time identifying a potential site and it is considered to present the best balance between operational/technical requirements and environmental impact.

Discount 15 – Greenfield – National Highways Depot, M62, Milnrow, Rochdale, OL16 4ER, NGR E: 392838 N: 411885

A site in this location has been reviewed by the operators radio planner. It can be discounted as it will not fulfil the coverage and capacity issues of the target area as a whole. Only one out of three sectors would provide coverage into the target area, given it is both outside the search area and would only be able to reach the lower parts of north west of the target area. This would lead to a poor user experience with dropped calls and buffering issues. This would be unacceptable to the operator and not viable. Therefore, this site has to be discounted as it does not meet operator's technical requirements.

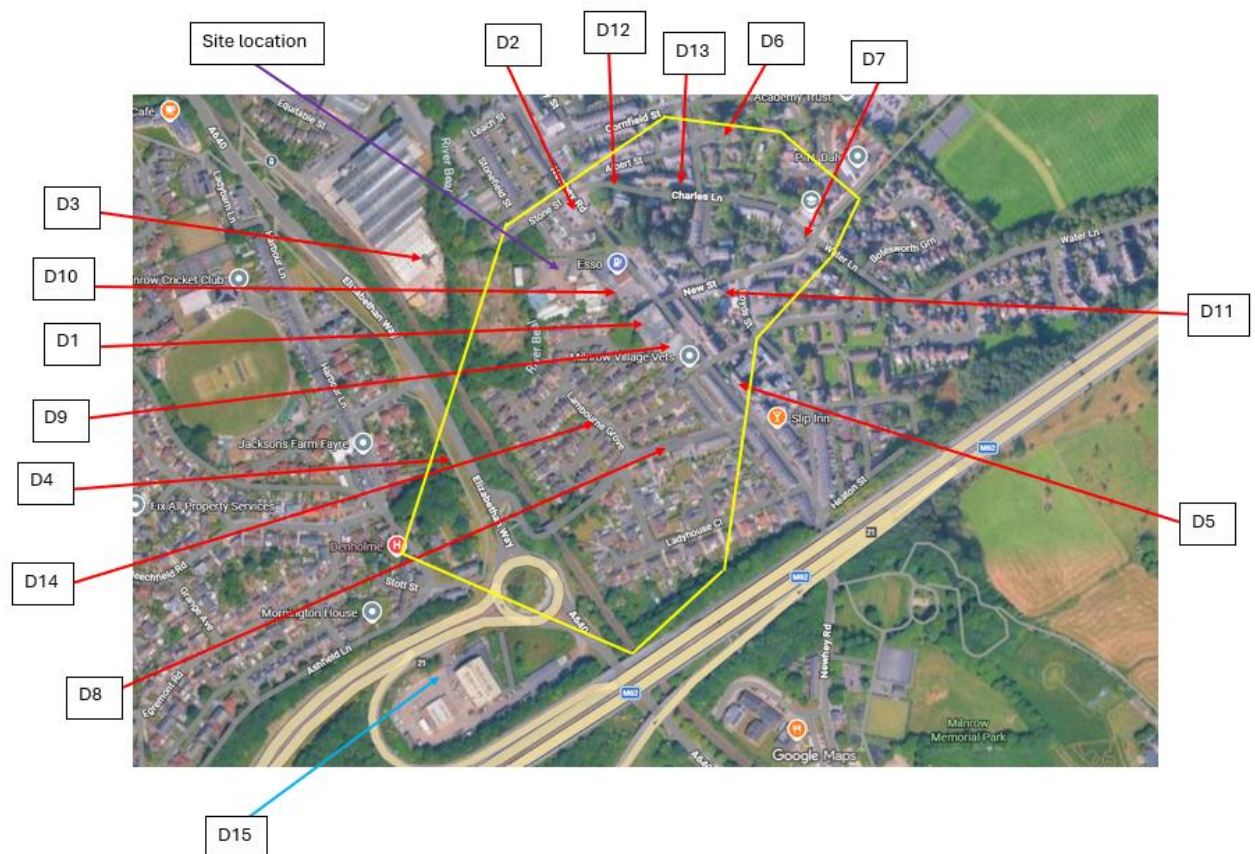
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Map 1: Discounted options and search area indicated by yellow polygon

As demonstrated within the discount map, if the site were to be moved anywhere else in the search area it would either be directly in front of residential frontages, lead to highway safety issues or be located within the conservation area, which was previously one of the main issues from a planning perspective. Anything outside of this search area would not work, it would leave a hole in coverage for the operator and another installation would be required to fill this hole in coverage. This would not be in accordance with the NPPF and have a greater visual impact on the area.

The search area is naturally smaller as the site is replacing an existing site for two different operators. Given the operators have different radio requirements and other existing sites in the region, this makes the search area more naturally constrained compared to a new site.

The discount map embedded in this statement shows the sites that were investigated for their potential to accommodate a telecommunications base station installation, however, for the reasons detailed in the table above the locations that have been identified were subsequently discounted in favour of the proposed site. With regards the matter of alternative sites, the attached High Court judgement and quotes below

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from the Justice Lang case in Birmingham has relevance when reviewing possible options and the reason given for discounting them. "41. *There is no general principle of law that the existence of alternative schemes is inevitably a mandatory material consideration in any case, even where the proposed development would cause adverse effects, but these are held to be outweighed by its beneficial effects: see R(CPRE) v Secretary of State for Transport [2023] EWHC 2917 (Admin) at [65].* 42. *Even where alternatives might be relevant, "vague or inchoate schemes, or which have no real possibility of coming about, are either irrelevant or, where relevant should be given little or no weight": see R (Save Stonehenge) v Secretary of State for Transport [2022] PGSR 74, at [270]."*

It is recognised that the origin of the chosen site subject to a Prior Approval application derives from the applicant's site search investigations within the defined search area, however, it should be at the forefront of the LPA's mind when making an assessment that the scheme is permitted development, hence the main focus should be on the proposal's siting and appearance itself. As a result, the Justice Lang caselaw is a material consideration in the assessment of alternative sites, these caselaw findings should be taken on board when assessing whether an option is truly realistic to be brought forward. Therefore, when taking into account the technical constraints that implicate on a proposal's siting, height and design, together with the need to locate a new base station within the defined search area, should the LPA believe there to be a different location that has its planning merits and is a superior option to the proposal advanced, they should discuss the site-specifics with the agent during the life of this application.

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

N/A

Land use planning designations:

Boundary of Butterworth Hall Conservation Area circa 20m east

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Figure 5: Map of Butterworth Hall Conservation Area and proposed site location (red arrow)

Boundary of Butterworth Hall (Municipal buildings) Conservation Area circa 68m south east

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

Relevant Planning Policy:

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- National Planning Policy Framework (2024) – Chapter 10, Supporting High Quality Communications Infrastructure
- Rochdale Core Strategy (adopted October 2016)
- Places for Everyone Joint Development Plan (Adopted March 2024)

Other relevant documents:

- The Code of Practice for Wireless Network Development in England (2022) – this document sets out the legal and policy framework for the delivery of wireless infrastructure development. It also provides design guidance and advice for local planning authorities when determining applications.
- Greater Manchester Digital Blueprint (GMDB) 2023 – 2026 (published May 2023) – The GMDB underpins and supports the commitments in the GM Strategy. It sets out 5 priorities to digitally enable a greener, fairer, more prosperous city region, this includes **extending world class digital infrastructure technology and data²**
- Greater Manchester Strategy (published July 2025) - A central pillar of the strategy is growing an economy that creates better jobs, attracts world-class talent, and boosts wellbeing for all. The strategy has an aim “**By 2030 all areas of Greater Manchester will benefit from next generation gigabit-capable broadband and 5G coverage, with support to get online available in every neighbourhood**”(emphasis added)
- 5G infrastructure is essential for:
 - Enabling advanced industries (AI, robotics, digital manufacturing)
 - Supporting small businesses with faster, more reliable connectivity
 - Attracting investment into the region through modern digital capability
- The strategy stresses that every person and every place must benefit from progress. 5G helps by:
 - Improving digital inclusion in underserved areas
 - Supporting remote learning and skills development
 - Enhancing access to online public services³

UK Wireless Infrastructure Strategy (April 2023) – The strategy has a bold ambition to ensure all populated areas in the UK have access to standalone 5G by 2030.

National Planning Policy Framework (2024)

² <https://www.greatermanchester-ca.gov.uk/what-we-do/digital/digital-strategy/>

³ <https://togetherwearegm.co.uk/our-vision/greater-manchester-strategy/>

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The Government's National Planning Policy Framework (NPPF) came into force in 2012, with the most recent revision published in 2025. The NPPF sets out the Government's planning policies for England and explains how these should be applied.

The Government's latest approach continues to strongly support communications infrastructure. The NPPF remains highly supportive of high-quality communications, dedicating an entire chapter (Chapter 10) to this topic. This reflects the importance the Government places on digital connectivity.

Paragraph 119 states that advanced, high-quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes paragraph 42 of the 2012 NPPF, while also emphasising the importance of reliability for both economic and social outcomes. The NPPF further supports the expansion of telecommunications, stating that "Planning policies and decisions should support the expansion of electronic communications networks" (para 119).

Paragraph 120 retains the requirement to minimise the number of installations, provided this remains consistent with the efficient operation of the network. It also adds that this must be balanced with the needs of consumers and the provision of reasonable capacity for future expansion.

Paragraph 123 continues the guidance originally set out in paragraph 46 of the 2012 NPPF. It states that planning decisions should be based on planning grounds only. Local authorities should not seek to prevent competition between operators, question the need for an electronic communications system, or set health safeguards that differ from International Commission guidelines for public exposure.

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

The NPPF continues to provide guidance on decision-making. Paragraph 39 states that local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental

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conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

The NPPF also builds on the aspiration to create a strong, competitive economy. Paragraph 85 explains that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider development opportunities. The approach should enable each area to build on its strengths, address weaknesses and respond to future challenges. This is particularly important in sectors where Britain can be a global leader in innovation, and in areas with high productivity that should be able to capitalise on their performance and potential.

Public benefits are defined within Planning Practice Guidance (para 020 Reference ID: 18a-020-20190723) as anything that delivers economic, social or environmental objectives as described in paragraph 8 of the NPPF (2024). The PPG states that public benefits should flow from the proposed development and should be of a nature or scale that benefits the public at large, rather than providing only a private benefit. However, benefits do not always need to be visible or directly accessible to the public to qualify as genuine public benefits.

The proposed development accords with these aspects of the NPPF because it will provide improved network provision within the area, delivering a range of associated economic and technical benefits.

For the UK to fully benefit from the potential of a reliable mobile network, Local Planning Authorities will need to balance the public benefits of enhanced connectivity with their responsibilities to manage the built environment. Central Government recognises that this may raise concerns regarding the design solutions proposed. However, it is important that Local Planning Authorities understand the technical needs of the network and appreciate the wider advantages offered by new technology.

These key benefits need to be weighed against any harm to the setting of the Conservation Area to the east. As will outlined below, it is the applicant's view the proposal will lead to *less than substantial harm* to this heritage asset and the significant socio-economic benefits outweigh this harm, in line with paragraph 215 of the NPPF.

Code of Practice for Mobile Network Development in England (March 2022)

The CoP strengthens national support for delivering high-quality mobile connectivity. It confirms that reliable digital infrastructure is essential for economic growth, social

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inclusion and access to public services, and that the planning system must actively facilitate new mobile sites and upgrades.

The CoP aligns with the NPPF, requiring planning decisions to support the expansion of electronic communications networks, including 5G. Local Planning Authorities are expected to work positively with operators, engage early, make timely decisions, and ensure Local Plans enable digital infrastructure.

The Code emphasises good siting and design, but also recognises the technical constraints of mobile networks coverage, capacity and backhaul which often require elevated antennas and, for 5G, a denser network of base stations. It notes that some previous camouflage solutions may not be suitable for modern equipment.

A balanced approach is sought between the technical needs and constraints of the proposed site and the potential impact of the development (para 26 of the Code of Practice). There are three technical and operational considerations for the installation of sites:

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

The Code of Practice states that planning authorities should consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. In general, it should not, therefore, be appropriate for planning authorities to seek wider evidence of alternative sites (beyond that required by the NPPF), unless they consider the proposed development is unacceptable having regard to the relevant material planning considerations.

The Code of Practice notes there are factors which affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals

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Overall, the Code makes clear that digital infrastructure is critical national infrastructure and must be delivered efficiently, collaboratively and in a way that balances connectivity needs with environmental considerations.

Rochdale Core Strategy (adopted October 2016)

The Core Strategy does not contain any telecommunication policy. The Council should use the NPPF, specifically Chapter 10. Using other design policies contained within the Core Strategy do not take into account the technical and operational constraints operators face when siting and designing a site. Therefore, the most relevant policy is contained within the NPPF.

Policy P2 is relevant due to the sites setting adjacent to the Conservation Area.

P2 - Protecting and enhancing character, landscape and heritage

2. We will protect the borough's heritage by:

a. Conserving, enhancing and promoting key heritage assets, both statutory and non-statutory, including consideration of their wider settings. Key heritage assets of the borough include:

- i. Four outstanding conservation areas: Central Rochdale, Middleton and Littleborough town centres and Rock Nook / Summit;
- ii. Other designated assets such as listed buildings, conservation areas, registered parks and scheduled ancient monuments;
- iii. The heritage of the Co-operative movement, the Rochdale Pioneers and the Labour movement;
- iv. The Edgar Wood and J. H. Sellers cultural heritage;
- v. The heritage of the seventeenth and eighteenth century vernacular tradition; and
- vi. The engineering heritage, including mills, canals and railways.

b. Conserving, enhancing and utilising other non-statutory heritage assets of local interest, be they buildings, parks, gardens or archaeological sites, including promoting their sensitive restoration;

c. Using heritage assets positively and intelligently to strengthen identity and image and support the visitor economy, particularly in development and regeneration schemes; and

d. Prioritising the conservation of heritage assets at risk from decay, giving special attention to designated heritage assets in this regard.

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Places for Everyone Joint Development Plan (Adopted March 2024)

The vision is to capitalise on the opportunities which were brought about the recent pandemic... the borough need to be places where people have access to the services they require through high quality digital communications.

The Places for Everyone Joint Development Plan provides an important opportunity to create the conditions for inclusive economic growth.

By the end of the Plan period, Greater Manchester aims to be a top global city. To do this it will require a range of attributes, including a strong economy, skills residents, a high quality of place and the environment, and a diverse portfolio of investment and development opportunities.

To meet the vision, the plan sets out 10 objectives. The most relevant to telecommunications are below:

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

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

Objective 9: Ensure access to physical and social infrastructure.

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

Chapter 10 of the Places for Everyone Joint Development Plan document details how the Greater Manchester region will become more connected and integrated.

Para 10.3 directly states that digital connectivity is growing in everyday life. The use of being able to be digitally connected allows people to connect with people wherever they are and access to a range of learning, employment and retail opportunities.

Para 10.21 acknowledges the rise in digital demand and the continuous of the demand is likely to continue. The area is to become "smarter" with services to adopted innovations such as connected and autonomous vehicles, artificial intelligence and the Internet of Things (where an increasing range of everyday devices are connected, monitored and operated via the internet). It is the Greater Manchester ambition to be the UK's leading digital city and one of Europe's top five.

Chapter 10 goes further to reference the importance of digital connectivity.

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Paragraph 10.29 refers to the opportunities that digital connectivity can bring are unprecedented and everyone should have the opportunity to access them so they can fully participate in society and the economy.

Paragraph 10.30 notes a global city requires digital infrastructure to be competitive and support high levels of social inclusion:

'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'.

Paragraph 10.33 recognises the growth and development that digital infrastructure and capability goes through. The evolution of digital connectivity through next generation technology has increased and so has the speed that it evolves. Digital infrastructure is therefore needed to adapt and evolve.

The plan directly supports the provision of affordable, high quality, digital infrastructure with Policy JP-C2 digital connectivity. In making decisions the plan supports 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'.

Planning Assessment

The main issue arising from this prior approval notification is whether the lattice tower would be a visually obtrusive feature and would be detrimental to the character and appearance of the Milnrow Area. Whether any perceived harm to the visual amenity of the area and the setting of the Conservation Area would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal. Including other valid material considerations as outlined within NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive and the relevant policies from the Rochdale Core

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Strategy, the Places for Everyone Joint Development Plan, Greater Manchester Strategy and the Greater Manchester Digital Blueprint.

The site complies with the NPPF, Places for Everyone Joint Development Plan, Greater Manchester Strategy and the Greater Manchester Digital Blueprint. as it will improve capacity and provide new 5G services to this area of Milnrow. Access to a high quality, reliable superfast mobile network is not just 'a nice to have' but an essential part of everyday life. In the latest UK Infrastructure 10 year Strategy (June 2025), the Government identifies digital connectivity being part of the long term future of the UK. The Strategy states:

"Digital infrastructure for growth and innovation

Para - 3.37 Digital infrastructure supports productivity growth through lowering costs for firms, underpinning technological change, widening access to labour markets across the country and enabling new and innovative services to be provided

Para - 3.38 Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and deployment. The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors"

The principle of development has been established by the Government when the new permitted development rights came in to force in November 2016, which enabled sites such as this one to be built under the operators permitted development rights, (as the tower height does not exceed 30m), with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

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

*'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a **light-touch process which applies where the principle of the development has already been established** (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important*

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*that a local planning authority does not impose unnecessarily onerous requirements on developers, and **does not seek to replicate the planning application system**' (emphasis added).*

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

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

Siting

The siting of the proposed lattice tower has been carefully considered. It is located as close as possible to the existing site to allow for the site to remain within a established area, whereby telecommunication installations have been located for a number of years. It has also been sited to be located within a light industrial area, with industrial style buildings surrounding the site. It is accepted the proposal is adjacent to the boundary of Butterworth Hall Conservation Area, however the applicant has sought to remove their existing equipment off the rooftop that currently sits within the Butterworth Hall (municipal buildings) Conservation Area, into an area that is outside of this heritage asset.

Demonstrated by the discounted options, discount map and lack of alternative options provided by the case officer at pre-application stage, the site area is constrained by residential properties in the wider area to the north, east and south west. Moving the site any further east, would not only move the site from being centred within the search area, it would also be located more prominently within the conservation area. As a result, it is seen as the ideal location to both provide the required technologies from a radio perspective and to minimise its setting on the conservation area.

The applicant is constrained by a tight search area due to the requirement to replace the existing radio base station at Albert Mill. The existing radio base station is not seen as a suitable location to host the latest technologies from a planning perspective. Two applications, one upgrading the existing site without GRP (21/01474/FUL) and the latest upgrading with GRP (23/01026/FUL). The conservation officer determined upgrading the existing site at Albert Mill would have a degree of harm to the setting of the conservation area, in which the benefits would not outweigh the harm. As a

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result, the applicant's search area is limited due to the requirement to replace this existing coverage and provide new 5G technology.

4G signals by their very nature (as they carry high data rates) do not penetrate over long distances, (5G even less so), just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness. Therefore, 4G and 5G radio base stations need to be close to their customer demand which is normally in residential areas. However, in this instance, the target coverage area is Milnrow. As this site needs to fill a gap in the operator's network, as well as providing replacement coverage, whose network configuration is well established in the area, the operator's search area is naturally smaller, than would otherwise be the case if the operator wasn't already providing service provision from this location. This severely limits the options for siting a new installation in the area.

In line with NPPF, the operator has demonstrated that there is a need for the proposed development. A rationale for site selection has been set out as well as detailed information on the operators approach to potential site sharing opportunities. The application package is accompanied by evidence of the operators pre-application consultation exercise and pre-application communication with the Local Planning Authority. The application package is accompanied by an ICNIRP certificate that demonstrates compliance with all relevant ICNIRP standards.

The siting within the light industrial area of C Norris Springs Ltd has been carefully considered. The case officer requested information on why the site could not be located further away from Newhey Road. Explained in section 2, the site is constrained the operations of a working yard. The applicant has worked with the site provider and moved the site circa 20m to the west to be further away from the Conservation Area and set back against the backdrop of a large industrial brick building.

The site provider has vehicles entering / exiting site multiple times a day, storage areas for various materials and suppliers, all of which need to be separated from each other for health and safety reasons. The location has been dictated by these operational constraints of the working yard. However, both have acknowledged the case officers request for it to be moved, which has been complied with to minimise its affect on the setting of the Conservation Area.

When assessing the sites impact on the Conservation Area, a number of resources can be used to determine the impact. Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (GPA3) states that 'setting is not itself a heritage asset, nor a heritage designation' (see page 4). Hence any impacts have to be described in terms of how they affect the significance

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of a heritage asset, and heritage values that contribute to this significance, through changes to setting. 'Conserving or enhancing heritage assets by taking their settings into account need not prevent change' (see page 8).

Additionally, it is also important to note that, as clarified in the Court of Appeal, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a listed building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. See *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

It is possible that development proposals will cause no harm or preserve the significance of heritage assets. A High Court Judgement of 2014 is relevant to this. This concluded that with regard to preserving the setting of a listed building or preserving the character of a conservation area, 'preserving' means doing 'no harm'.

Preservation does not mean no change, it specifically means no harm. GPA2 (Historic England's Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2) states that 'change to heritage assets is inevitable but it is only harmful when significance is damaged'. Thus change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

The PPG provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit"

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset

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- securing the optimum viable use of a heritage asset in support of its long term conservation”.

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- Designated heritage assets of the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 73 of the NPPF;
- Designated heritage assets of less than the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and
- Non-designated heritage assets. Non-designated heritage assets are defined within the PPG as “buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.

In order to relate to key policy, the following levels of harm may potentially be identified for designated heritage assets:

- Substantial harm or total loss. It has been clarified in a High Court Judgement of 2013 that this would be harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”; and
- Less than substantial harm. Harm of a lesser level than that defined above.

As such, there will be a degree of harm to the setting of the Swinton Conservation. However, the sites location in an area where it is away from the main high street and town's historic centre, in an area that is light-industrial / commercial in nature with significant screening to ensure the majority of the sensitive receptors contained within

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the Conservation Area are protected. As per, Historic England's advice (see above), the change in the setting will be limited to "*less than substantial harm*".

It is considered the proposed siting represents the best location to minimise harm to visual amenity and the conservation area. It is located in an area that is light industrial, whereby telecommunications infrastructure is often readily expected to be viewed. It is accepted the proposal will be visible from the conservation area, however its visibility would only be exacerbated anywhere else to the east and south east of the search area. A streetworks site would not work due to incapability of being a shareable structure given the weight of the equipment for both of these operators, so it would not be shareable. As a result, two monopoles would be more prominent, located on the narrow footways, contained within the conservation area, compared to one that is located outside of the Conservation Area and set in the context of a light industrial area.

Submitted as part of this application a two appeal decisions. The decisions highlight inspectors have found harm to the area from the proposal but when considering the alternatives, this harm was outweighed by the lack of alternative options that would provide the required coverage and capacity. It is accepted the designs of the sites were slimmer, however these were single operator sites, whereby only VMO2 was a host. This application is for two different operators, both of which currently occupy the rooftop, they looking to replicate and enhance their existing coverage which dictates the design of the mast.

See PINS decision Hollin Lane which was approved in March 2025, an appeal was allowed in a similarly densely developed residential area in Rochdale, Hollin Lane for the installation of a 20m monopole supporting 6 no. antennas (appeal ref: APP/P4225/W/24/3353275). There are numerous comparable points in the location and findings from the inspectors decision. However, the main point is the inspector noted there would be moderate harm that would arise from the proposal, they weighed this up against the alternatives in the site selection process. This balancing exercise also referenced that alternatives outside of the search area, would not achieve the required coverage or capacity, see paragraph 16:

'It is clear from the evidence presented that the number of sites considered within the constrained search area is extensive. I am satisfied that an installation located outside of the search area would not allow the operator to provide their desired level of coverage or capacity. Other appeals within the search area and vicinity of the appeal site have previously failed, including one for which I was also the Inspector. This helps to demonstrate the extent to which other sites have been considered and pursued in the search area. With no evidence to indicate otherwise, the appellant's site selection process appears

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to be robust. Drawing the above points together, I am satisfied that there are no more suitable available sites within the search area'.

In contrast, this location is located at within a light industrial setting, whereby it would be near to a conservation area, however the harm attributed to the conservation area would weigh up to less than substantial. This harm not only needs to be weighed against the significant socio-economic benefits, along with the alternative sites and whether these would not only provide a lesser degree of harm but also work operationally from a radio coverage perspective.

In an appeal on Woodcock Hill in Harrow for a 20m monopole column in relation to the operator needing to find a replacement site in order to replicate and improve existing coverage following the loss of an existing site nearby for redevelopment reasons, the inspector allowed the appeal even though they found the monopole would be visually prominent, there were no alternative options that could provide the required coverage and capacity (PINs reference: APP/J4423/W/20/3252355). They also considered alternative options within the search area would have a greater harm on visual amenity, a similar scenario to this application, therefore it was deemed acceptable:

Para 14 "Therefore, I am satisfied that there are no other mast sharing opportunities, suitable buildings or other structures within the required search area that would be capable of accommodating the proposed installation. Although the proposal would be visibly prominent, there would be some limited mitigation offered by having the lower parts of the mast set against a backdrop of trees and it would be located a sufficient distance from nearby dwellings, which is not the case for all alternative locations. Third parties have not put forward any further alternative sites which have not been considered by the appellant"

Para 15. "I conclude that the siting and appearance of the proposed installation would cause harm to the character and appearance of the surrounding area. Whilst alternative sites may exist, the appeal proposal is preferable for the reasons outlined above. Therefore, any identified harm is outweighed by the need for the installation to be sited as proposed, taking into account the suitable alternatives"

Whilst the operator is not being forced off their existing site, they are looking to replace existing coverage, trying to enhance and provide new 4G and 5G coverage in order to fill a gap, there are still some key points raised by the inspector. Again, the inspector found whilst there would be harm to character and appearance of the area, there were no other suitable alternatives that would provide the required coverage and capacity to the area. The search area was constrained with underground services,

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narrow footways, unsuitable rooftops and lack of space anywhere else within the search area. A similar case here, there is nowhere else for the operator to locate their mast, hence the reason they have reduced the height of the monopole to minimise its visual appearance.

To conclude on the matter of siting, it is very important to consider effective, improved network coverage and capacity and new 5G connectivity services can only be supplied by development within the search area parameters. The site has been nominated following an exhaustive and sequential site selection process which has confirmed that no existing base station sites or consents exist within the search area that can be used and with the majority of the search area occupied by built up, residential land, there are no better operationally viable, available, rooftop sites or other structures. The use of a new ground-based mast is clearly the last and only available option.

Appearance

The appearance and design of the installation has been selected to balance both the technical requirements and constraints associated with telecommunications development and to minimise harm by considering planning, environmental and visual considerations.

The tower is proposed to be 20m in height. This is required to ensure the antennas clear the buildings, trees and to operate effectively. Anything lower would lead to a poor user experience for a large part of the target coverage area. As such, this would fail the operators design brief, and an additional installation would have to be found leading to the proliferation of masts contrary to national planning guidance contained in the NPPF.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear items of street furniture. Being taller than more traditional urban items of street furniture in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures. Greenfield installations such as this one can often be found in light industrial settings.

Being of a lattice style will ensure views from Newhey Road towards the site will not appear bulky or dominant compared to a solid monopole. The lattice style also allows for greater orientation of the antennas. Given the site is shared by two different operators who have different frequency licenses and coverage requirements, this is a key factor to consider. If the antennas interfere with each other they will simply not work, they need to be able to operate effectively without compromising each other.

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The additional antennas are required in order to bring 5G into the area for two operators and improve the existing 4G coverage and capacity in this cell area. This is in fully accordance with national guidance contained within the NPPF, the Code of Practice, Greater Manchester Strategy and Greater Manchester Digital Blueprint .

The headframe is required to be open in order to accommodate all of the operators equipment on the applicant's mast. Due to its height, on the top of the tower, it will be out of the natural eye line and not draw attention from any significant views given its location within a light industrial area, adjacent to a light industrial units. The design of the headframe allows for antenna orientation to provide 360 degree coverage to this area. The ERSs are designed to make the antennas more efficient and reduce the amount of additional equipment cabinets at ground level. This minimises the impact on the visual amenity of the area. In order to maximise signal efficiency the ERS's need to be as close as possible to the antennas, hence they need to be located underneath the antennas and at the top of the lattice tower. Given their height above ground level and their small size approximately that of a shoe box for the ERS, they will not appear prominent in the area as they will be out of the general eye line of casual passers-by.

The colour of the new tower is proposed to be Galvanised, to allow it to blend with the typically grey British skyline. However, the mast can be coloured any other colour that the authority considers appropriate if required.

As has been set out, telecommunications equipment is subject to a number of technical constraints which limit the scope to alter or camouflage the functional and operational nature of its design. Notwithstanding this, every effort has been made to select the least obtrusive location and design, including limiting the size of the installation to the minimum height required for operational efficiency and using the smallest practical components.

For these reasons, the proposed development is considered to be of the least obtrusive location in terms of siting and most appropriate design in terms of appearance. It is also considered to be the least harmful location when considering the alternative sites.

Lack of Coverage – Material Consideration

Explained above, the “*less than substantial*” harm identified needs to be weighed against the public benefits, along with the alternative sites and whether there are any alternative locations that would provide a lesser degree of harm, whilst providing the required replacement coverage and capacity.

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Attached as part of this application is a letter dated 29 November 2024. The letter is from Sir Chris Bryant MP to Council Leaders and Council Chief Executives across the UK in support of digital infrastructure deployment.

The letter confirms the importance of fast and reliable connectivity and the Government's commitment to supporting the delivery of next-generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

There is a specific ask in the MP's letter that Councils '**support the deployment of communications infrastructure wherever possible**' (emphasis added).

In accordance with the NPPF, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Milnrow continues to get the mobile coverage it needs for VMO2 customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 and VodafoneThree network which includes GiffGaff, Tesco Mobile, Sky Mobile on the VMO2 network and VOXI, Lebara, Talkmobile, Asda Mobile, Id Mobile, Superdrug Mobile, SMARTY and Honest Mobile on the VodafoneThree network. So the proposal will not only provide a service for two operators but those who buy network space off them, which is at least 11. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposals will support the aspirations of Central Government for everyone to have access to the superfast highway network wherever they are and that all populated areas are connected to the 5G network by 2030. This is also in line with the ambitions of the Greater Manchester Digital Strategy which recognises that the future vitality of cities is increasingly based on their ability to use digital networks in intelligent, strategic ways.

Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing. The proposed radio base station will enhance existing service provision and provide new 5G technology which will support this policy justification. By providing the latest 4G and 5G technology the

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proposals will also help meet the aspiration of the Places for Everyone Joint Development Plan for Greater Manchester.

Digital growth plays a fundamental role in driving economic growth. This aligns to meet the opportunities set out in the Greater Manchester Digital Strategy as the global economy shifts, so do the opportunities in Manchester, including digital adoption and connectivity.

The proposals will ensure that any VMO2 customer in this cell area will be able to access resilient, seamless connectivity at a speed they need anywhere at any time. Without the more basic technology solutions such as 5G, the Framework acknowledges that smart-region solutions and value-added outcomes will struggle to be brought to fruition.

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

By enhancing the 4G and 5G service provision to the surrounding area and being a lattice tower it can be easily future proofed for future technologies into the operator's network, this would fully support the vision of Central Government that people will be able to access the 'information highway' wherever they are.

The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.

The proposed installation of the lattice tower in this location will fill the current gap in the latest high quality service provision and enable VMO2 and VodafoneThree customers to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Government's aspirations that everyone has access to the superfast communications network, contained within the NPPF. The Greater Manchester Strategy is committed to using technology and data proactively and responsibly, giving people the connectivity, tools and know-how to work and live smarter.

The way 5G works, it is closely connected with the Smart City agenda and will enable centralized control of lots of different street infrastructure owned or managed by councils, such as street lights, water meters and bus stops. Manchester is fully committed to being a smart city and being a world-leading digital city region, as highlighted in the Greater Manchester Digital Strategy and Greater Manchester

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

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Strategy. As such it needs the 21st century infrastructure to enable this objective to become a reality.

It is therefore imperative that the operator continues to invest in ensuring that the latest technologies are available on its network, so that customers are able to continue to use their handheld devices. There are significant socio-economic benefits associated with telecommunications, the aforementioned Government publications, combined with the regional policies all recognise the importance of having strong digital connectivity. Without this installation, this area of Milnrow will fall behind the rest of Rochdale, contrary to Greater Manchester Strategy.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Rochdale Core Strategy. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Enhancing and replacing the 4G coverage and capacity in this area and providing new 5G services will fully meet this national policy objective. Continuing to transform the digital connectivity of the city-region to drive economic growth and innovation, working to meet national and Greater Manchester targets of full roll-out of 5G technology for all populated areas by 2030.

A recent report by MobileUK looks into the challenges faced by the industry in bringing about a step change in the sector's capacity for raising capital for significant infrastructure upgrades. The report found, for every pound invested by the operator it returns £5 GDP to the local economy (Mobile UK study). i.e. returning 5 x the value to the local area. The multiplier effect. The proposal should be well balanced between the visual harm compared to the significant social and economic benefits mobile connectivity brings. The operator has a massive infrastructure investment to your area, which should not be understated in its impact on the local economy, Cornerstone is a key enabler to the local economy.

For every £1 invested in digitally upskilling someone equates to £10 back to the local economy. But if they then cannot access the latest technology, it could well push them to leave the area taking their new found skills with them. Without this installation, those living and working in the area will not reap the benefits of 5G.

Every time a planning officer refuses an application for telecoms it means the application cannot invest their money in their infrastructure to deliver better

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connectivity to your businesses and the multiplier effects are simply not received. i.e. no knock on benefits⁴.

The proposal should not be viewed in isolation, instead the wider public benefits weigh heavily in favour of the proposal, along with the lack of alternative sites that provide equal coverage and capacity, whilst having a less degree of harm on the setting of the Conservation Area. There are strong material consideration in favour of improved digital connectivity, both via regionally and nationally published documents referenced throughout this statement. It is concluded this is the most suitable solution to provide the required technologies to the area, whereby there is currently a hole, identified within the submitted coverage plots, whilst providing the least harm to the setting of the Conservation Area. In accordance with the NPPF, it is considered the benefits and lack of alternative sites outweigh the less than substantial harm.

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

Education:

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

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

Health:

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

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

⁴ <https://www.mobileuk.org/rebalancing-act>

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private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Summary

The proposed radio base station is proposed to be located on private land, off Newhey Road, in a light industrial area. The applicant has worked with the site provide to find a suitable site that works for all parties, avoiding any conflict with their operational needs of a busy, working yard.

As part of VMO2's continued network improvement program, there is a specific requirement for a new installation at this location to provide improved 4G coverage and capacity, and new 5G coverage, ensuring that this area of Milnrow has access to the latest technologies. The site will also be shared by VodafoneThree to provide their latest technologies from the one mast. It would remove the equipment off Albert Mill and restore the building back to its natural state.

As this is a prior approval application, the Government confirms that this is permitted development, akin to outline planning permission, with just the finer details of siting and appearance to be considered by the local planning authority.

The proposed height at 20m is essential in order for the antennas to clear the surrounding urban clutter, trees and ensure the antennas are able to reach the target coverage area, to provide new high quality 4G coverage and capacity and new 5G service provision to Milnrow. This will fully meet the national Governments aim of 'ensuring that everyone is connected to the information superhighway' and the national policies set out in the NPPF. If the height of the column were to be reduced then the antennas would not be able to operate effectively, leading to a degraded service for the operator's customers especially for the higher frequency technologies including the latest 4G technology and new 5G service provision.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. This is fully supported by the NPPF. These benefits are strong material considerations which outweigh any perceived loss of visual amenity and the less than substantial harm to the conservation area.

Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Joshua Fiteni MRTPI	Telephone:	Tel: +44 (0)161 785 4500
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Signed:	<i>joshua fiteni</i>	Date:	06/07/2026
Position:	Town Planning Manager	(on behalf of Cornerstone)	

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