

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	LAND AT CASTLE ROAD FARM	Site Address:	LAND AT CASTLE ROAD FARM, CASTLE ROAD, UNSWORTH, BURY, BL98QR
National Grid Reference:	E: 382241 N: 407781		
Site Ref Number:	30870200	Site Type: ¹	GREENFIELD

2. Pre Application Check List

Site Selection

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

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	23 rd May 2025
Name of contact:	Jennie Townsend

¹ Macro or Micro

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

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

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Summary of outcome/Main issues raised:

A response was received in relation to our pre-application consultation request under reference: 03078E. We also had a call to discuss the application further and agreed that we would supply a larger location plan to include the nearest residential property (sheet 100A) and photomontages showing a representation of the mast in the landscape.

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

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Consultation letters have been sent to local ward councillors and the MP for this area welcoming them to make comment.			

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Summary of outcome/main issues raised (include copies of relevant correspondence):

To date no comments have been received on the proposal.

School/College

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

No schools nearby

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	23/06/2025	

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3. Proposed Development

The proposed site:

Government is committed to supporting investment in high-quality, reliable digital connectivity so that communities can benefit from faster economic growth and greater social inclusion. It is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities.

As part of Telefonica and VodafoneThree's continued network improvement program, there is a specific requirement for an upgrade at this location to provide improved technical provisions, greater capacity, and coverage in the area as well as the introduction of 5G technology. This ensures that coverage and capacity requirements are maintained and enhanced in line with the operator's license.

This application is part of a network upgrade programme for Telefonica (VM02) and VodafoneThree which will introduce improved 4G signal strength and capacity and new 5G connectivity for the area. There is an existing mast nearby which currently hosts equipment for all four operators and was under investigation for an upgrade. This existing mast failed structural calculations to be able to provide new and improved connectivity for the operators and a new site was the only option in the search area.

WHP Telecoms have been commissioned to act on behalf of Cornerstone for the proposal in front of you. The specific proposal to provide the most up-to-date technology and comprises the proposed installation of a new 30m lattice tower supporting 12no. antennas and 4no. 300mm dish antennas. The installation of 6no. equipment cabinets all within a fenced compound, and all other associated ancillary apparatus and permitted development thereto

The proposal falls within the limitations of permitted development pursuant to Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), and consequently requires the prior approval of the authority as per A.2 (3) of Part 16 of the GPDO.

It is recognised that the very nature of installing new 5G communications infrastructure within the landscape requires a well-measured balance between the need to provide practical coverage and impact on the surrounding area. We believe the location to be appropriate in the landscape, being located near to existing infrastructure and designed to be slim at the most visible section reducing is impact on the surrounding area.

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Figure 1: Proposed site location with the motorway in the background

The proposal would appear as normal from many views, including from the motorway and any views from the west where it will assimilate with the existing mast, screening from nearby trees, and industrial character of the motorway. As you head north on Castle Road, the elevation slopes and the visibility of the mast would be very limited in many locations and as you head south on the same road there is more screening and the mast would only be partially visible. The highest visibility would come from close views, such as the property directly to the south. Overall, we believe that an visual harm that may be caused would not be significant in the context of the wider area and the benefits that are significant would outweigh this.

The height of the mast has been kept to the minimum necessary to provide the required frequencies and coverage by the operators and to maintain compliance with the International Commission of Non-Ionising Radiation Protection standards. The bulk and amount of equipment has also been design with function in mind and to provide both the necessary apparatus and the ability to continue to provide new technology in the future. We believe that the form will be softened in the landscape due to nearby tree screening and existing infrastructure in the area.

We believe that given the distance and the lattice design the mast will have no significant effect on residential amenity with the nearest residential property approximately 110m from the site location. Any homes nearby will only have a view

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of the proposal from the rear of the property and while there is no guidance available for this specific type of development, we believe our views are supported by SPD 6. This planning document is used as guidance in relation to residential properties and extensions and specifically for this proposal looks at aspect standards to protect residential amenity. The height of the mast at 30m would be equivalent to a 9 or 10 storey building and by the SPD 6 guidelines would suggest there should be around 40m separation between a ground-floor principle window to a blank wall, or in this case lattice tower structure. While it is accepted that this may not correlate perfectly with the guidance, the lattice design located with trees in the background along with the ample distance from these homes should demonstrate that residential amenity would not be a concern for this development. Any noise from the installation would only come from cabinet cooling fans that activate on hot days and would be significantly quieter than the noise from the motorway.

The proposal has been sited and designed to avoid any perceivable harm from the development while providing an essential service of improved connectivity which is supported at national and local policy level. General coverage and especially 5G technology is greatly lacking in the area for both VMO2 and VodafoneThree and our submitted predicted coverage plots show the potential community and technological benefits should this application be approved. Given that the siting and design that has been put forward is the best available to the applicant in terms of reducing visual impact, protecting residential amenity, protecting the natural environment, and providing a public benefit of improved connectivity for the area; it is believed that the assumption in favour of sustainable development should be applied and prior approval granted.

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Figure 2: A view towards the mast location from NGR (E 382469 N 408030) where the mast would not be visible. This was confirmed with a drone flown on site at 30m in height.

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

This can be provided upon request.

Type of Structure (e.g. tower, mast, etc):

Description:

The proposed installation of a new 30m lattice mast hosting 12no. antennas and 4no. dish antennas, 6no. equipment cabinets all within a fenced compound and all other associated ancillary apparatus and permitted development thereto.

Overall Height: 30m

Height of existing building (where applicable): NA

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Largest Equipment Housing: (W x D x H in mm)

750x680x2220

Materials (*as applicable*):

Tower/mast etc – type of material and external colour:	Galvanised Steel
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Equipment housing – type of material and external colour:	Generic Grey
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Reasons for choice of design, making reference to pre-application responses:

The applicant would reiterate that the siting of any base station proposal is intrinsically linked to operational need, the availability of sites and the land uses present within the target area. The design of a base station is in turn dictated by function and the context of the nominated site. The Applicant has followed the sequential approach outlined within National and Local policies and with no option to upgrade existing sites or use buildings this was the most appropriate option.

The principle of this development is already established by the GPDO and by the existence of nearby infrastructure development and vertical structures, therefore the design is believed to be the most respectful option that balances technical needs with the visual sensitivities of the landscape. For confirmation, the structure's height is required due to ICNIRP guidelines and coverage necessities. The 5G equipment and antennas are quite different to the previous, and existing, service requirements. It creates new ICNIRP regulations for the Operator to abide by and this mostly requires a greater height extension. It also operates at higher frequencies where attenuation of the radio signal is naturally higher, and the effects of clutter are greater. The proposed height ensures that the topography of the landscape does not have an unacceptable impact upon mobile signal quality. 5G also uses adaptive beamforming technologies, unlike previous generations and this increases capacity and data speeds to the user but requires a taller antenna height. The proposed height and associated visibility should not outweigh the overall public benefit of the scheme.

The technical requirements of mobile communication operators are acknowledged in the National Planning Policy Framework which states that local planning authorities should support electronic communications networks and their provision, including telecommunications and high-speed broadband. The Applicant has successfully explored their site sharing opportunities in accordance with the sequential approach outlined within the NPPF.

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

Health and Safety - including ICNIRP compliance

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

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

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4. Technical Justification

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

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

The dynamic nature of technological advances in the telecommunications industry coupled with ever-increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their license requirements, mobile operators are constantly developing their networks including filling holes where there is currently a lack of service provision. In this instance, the proposal is required due to acute capacity issues and will facilitate significantly improved 5G coverage in an area that has not gained this level of connectivity yet.

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5. Site Selection Process

Alternative site options considered are as follows:

The defined search area for this essential upgrade (providing improved connectivity) includes a large area of residential properties and this area was generally discounted due to the inappropriate nature of a large shared (multiple operators) mobile phone base station within this area. It was essential to find an elevated position above the motorway and there was also large sections of thick tree coverage and uneven ground which were considered not possible for build. The area to the east of the M66 where the site is located is also within Allocation JP 1.1 (Northern Gateway) of Places for Everyone. While our selected location is within this allocation, we have kept it to the boundary with the motorway so as not to interfere with any future development applications here as much as is reasonably practicable. The potential development of the Northern Gateway project also brings a much greater need for improved capacity and high levels of connectivity in this area and this proposal will help to future proof connectivity here for VM02 and VodafoneThree.

[https://gridreferencefinder.com?gr=SD8224107781|Proposed s Site|2,SD8221807999|D1|1,SD8218708214|D2|1,SD8241707827|D3|1,SD8237707748|D4|1,SD8230007620|D5|1,SD8227107567|D6|1,SD8226907591|D7|1,SD8229607494|D8|1,SD8215207513|D9|1&v=r&labels=1](https://gridreferencefinder.com?gr=SD8224107781|Proposed%20Site|2,SD8221807999|D1|1,SD8218708214|D2|1,SD8241707827|D3|1,SD8237707748|D4|1,SD8230007620|D5|1,SD8227107567|D6|1,SD8226907591|D7|1,SD8229607494|D8|1,SD8215207513|D9|1&v=r&labels=1)

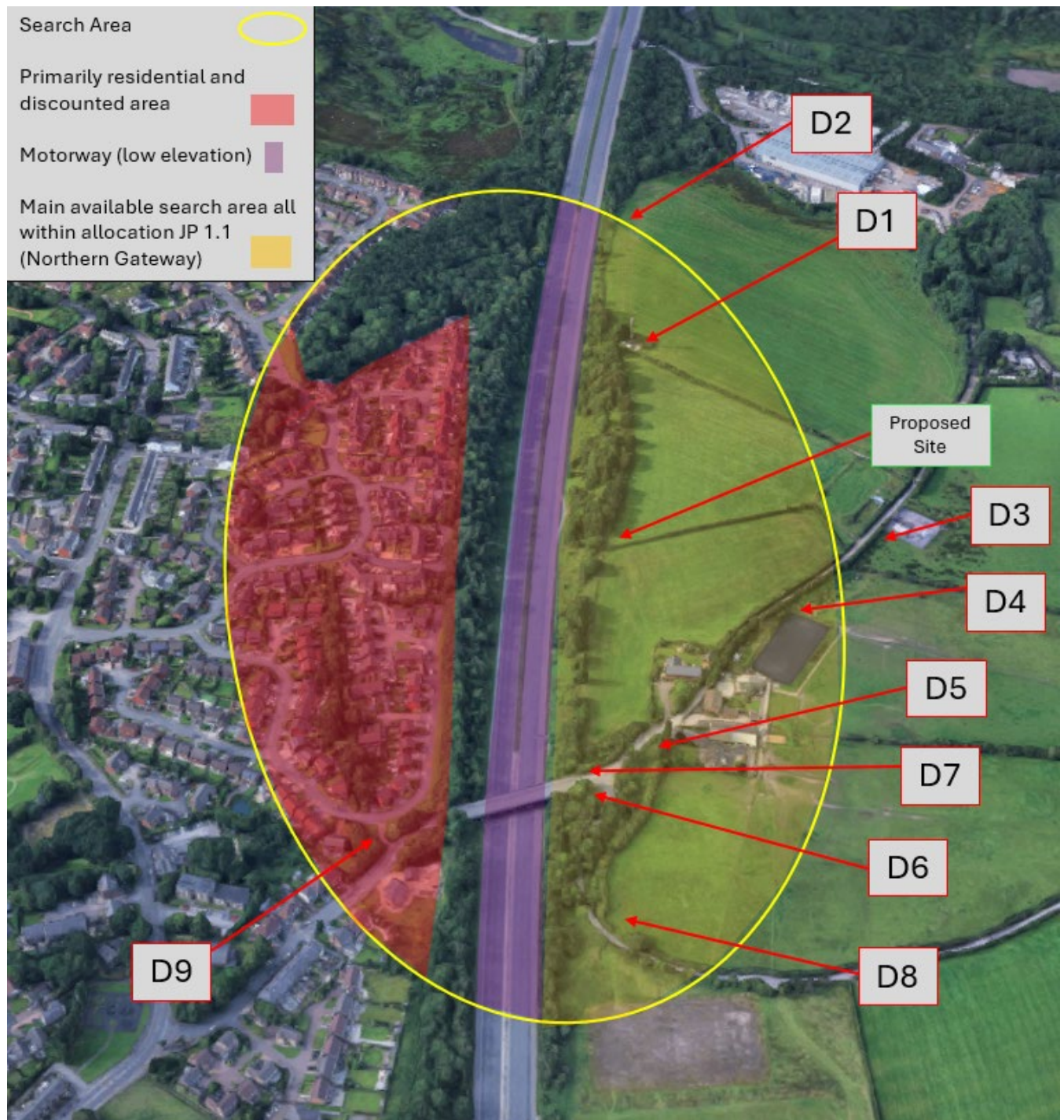
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Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1	Existing EE Mast, 215m North of the Proposal	E 382218 N 407999	This existing 25m EE owned mast was investigated as part of the site share programme and was ultimately cancelled to look for alternative options. VM02 and Vodafone both need major upgrades in technology at this location and the mast was failing structural calculations to provide this new equipment. Both operators would require 6no. new antennas to provide the most up to date 4G and 5G technology to the area. The addition of this equipment at the existing heights which are circa 20m and 17m was failing structurally on the existing mast. This meant that the upgrade could not go ahead at the existing height, and the operators really need an increase in height at this location to provide appropriate coverage for the wider area, this would have meant an extension of the mast which was certainly not going to be structurally possible. Global Design Checks (GDCs) had confirmed as part of this previous project that strengthening was not possible and that the upgrade as proposed was not possible. For these reasons the existing mast was discounted as an option as it is not upgradable.
D2	Land 220m North of the existing EE mast.	E 382187 N 408214	This location was considered as a similar option to the proposed in the corner of the field but towards the edge of the search area. This

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			option was discounted for radio reasons with the land dropping off further at this location and signal not affectively reaching the target coverage areas.
D3	Land Near Gas Station, Castle Road.	E 382417 N 407827	Although this location is outside the search area it was investigated for the reason that it has existing infrastructure in this location and may be an appropriate planning option. There can be however many challenges for build near gas lines and sometimes these cannot be diverted. In this case though the land was at a significantly lower elevation and this location could not provide the coverage requirement with a 30m mast, such as the proposed site.
D4	Land off Castle Road	E 382377 N 407748	This location was investigated but was not a good location for radio again as it would not give much coverage to the area on the other side of the M66. The drop off in elevation from the proposed site can also be seen in the submitted site photographs. We also felt that a site closer to the trees and motorway was a more appropriate option and that it would be more sustainable going forward with the Northern Gateway project (JP1.1) likely to make use of these open spaces for commercial and residential uses in the near future.
D5	Land at Castle Road Farm Entrance	E 382300 N 407620	This location was considered as an area with space for a new base station but was not preferred by the landowner as it could cause more disruption to the business of the farm and would be more visually impactful to the residential

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			properties nearby. Overall, the proposed location was seen as a more appropriate planning option and better for operational reasons.
D6	Grass Verge near Castle Road	E 382271 N 407567	This option near the bridge was considered, however there would not be sufficient space for a 30m lattice tower at this location and it could only accommodate a monopole up to 25m which would not have been able to meet the coverage requirements at this location and was discounted for operational reasons.
D7	Grass Verge near Castle Road	E 382269 N 407591	This location was briefly considered as an alternative location to D1 with more screening towards the bridge and motorways and less impact on residential amenity. It was however not possible to build here due to large overhead power cables nearby.
D8	Field at Griffie Lane	E 382296 N 407494	This option was considered for a similar design as the proposal within a field with sufficient space for a base station. It was considered however that given the JP1.1 allocation here this land would be in a prime location redevelopment and a mast here could potentially disrupt any plans in this area more so than the proposed location which is kept off to the edge of the motorway. In operational terms there is also a risk of being served a notice to quit by a future landowner if we were in an area that was prime for residential or commercial development and the mast would have to be removed. Additionally at this location the radio planner

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			had advised that the coverage to the west of the motorway would not be as good here and that the proposal was the preferred option.
D9	Grass Verge near Caste Road and St Georges Road	E 382152 N 407513	Although this residential area was all discounted as inappropriate for the proposal we looked at one location on the edge of the residential area. It was believed that all that would be appropriate in this location would be a 20m monopole with a headframe which would still be a significant structure in the area that has a residential character with low lying buildings. If this were the case then the search area would require a cell split, necessitating a further mast on the other side of the M66 to accommodate coverage on that side and generally in the area. It was felt that this option would not be considered a sensible planning solution and that 2 masts in the area to accommodate what one mast could, would not follow best practice.

Land use planning designations:

Landscape Character area under Policy JP-G1 of Places for Everyone.

In this context it is important to establish that the statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established. The planning Inspectorate supports this argument (APP/L3625/W/23/3314614 – Jan 2024) that:

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

We believe that the above statement in relation to local plan policies and the green belt would also apply in this case and rather issues of siting and appearance will be the main considerations. We have demonstrated that the applicant has attempted everything possible to reduce visual impact in this case, given the technical/operations constraints, using the best siting and design available to them within this search area. With this in mind it is considered that the development is appropriate, and prior approval should be granted.

Additional relevant information:

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

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

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

Digital infrastructure also increasingly underpins the provision of services critical for the functioning of society, business, and government – including the operation of other infrastructure sectors. In particular, demand for data centre services is projected to surge over the next decade including for AI development and

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deployment.¹²⁰ The government is committed to facilitating the development and expansion of cutting-edge, secure, and sustainable digital infrastructure that meets the needs of both the private and public sectors.

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

Why does this matter? Because the economic arteries of the country – from roads, railways and airports to water, energy, digital and housing infrastructure – help deliver a more productive economy. And a more productive economy results in economic growth and better living standards for people in every part of the country.

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

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

National Planning Policy Framework

The government's National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Section 2 of the NPPF confirms that sustainable development is at the heart of the Framework. Paragraph 8 states:

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

- to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

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- *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

The installation will enable the operator to provide the required improvement to 4G and 5G services in the area, forming part of a network of high technology. These services allow home working and working on the move and can reduce the need to travel, thus contributing to the sustainability agenda.

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

Paragraph 120 states 'The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate'.

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

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

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

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In order for the UK to benefit from the huge potential of 5G Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of 5G and better understands the wider advantages of such new technology. This is further emphasised within the Commission's sixth Annual Monitoring Report, which is now known as the Infrastructure Progress Review, in March 2023. It concluded that the government has ambitious goals for infrastructure, but in many areas, it is not delivering fast enough. It did acknowledge that digital 'Infrastructure is a key part of the solution'.

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

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

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

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

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

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

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

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

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

Local Policy

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

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Places for Everyone, Joint Development Plan Document, 2024.

The adopted Local Plan for Bury Council has two policies which are particularly in support of improved digital connectivity. These are JP-C1 (An Integrated Network) and JP-C2 (Digital connectivity). In particular JP-C1 states that the council areas will support high quality digital infrastructure *to help deliver an accessible, low carbon Greater Manchester with world class connectivity*. JP-C2 goes further to explain that the council areas will support a range of measure while making decisions including: *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*.

It is believed that this proposal is of high-standard design and will certainly deliver high quality connectivity for VodafoneThree and VMO2 customers in the area. We believe the siting and appearance are appropriate and will certainly protect townscape quality in this context while delivering a base station that has the ability to adapt to future challenges and the introduction of new technology without the need for more masts in this area.

Policy JP-P1 Sustainable Places is also of importance, and it is believed that by the appropriate siting and design brought forward with the most up to date technology and functionality that this proposal does bring further sustainability to place. Enhanced mobile technology can help to create socio-economic inclusivity in terms of health, transport and access to critical services. This service is available to everyone at very affordable rates and is widely recognised to help economic growth and improve people's ability to work remotely, in the field, or build their business. The increased coverage and new 5G technology this proposal can offer will help to meet targets for liveable and sustainable places in this community. JP-D1 goes on to discuss the importance of infrastructure in supporting the delivery of the development plan and is another example of why high-quality well-designed proposals should be encouraged and supported where possible.

It is believed that the proposal is generally in line with local and national policy and that the benefits of this proposal critical infrastructure are also a material consideration. The points discussed thus far in relation to the siting and appearance of the proposal would indicate that the development would be appropriate and prior approval should be granted.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Core Strategy. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide

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

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

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

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Numbers of this scale cannot be underestimated. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time, and run our public services.

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The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line.

Health Benefits

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

Bristol harbour installed thermal cameras specifically designed to alert the authorities when people fall into the water. The technology was implemented after ten people tragically died in drowning accidents in the city in one year alone. The thermal cameras pick up when a person breaks a virtual barrier at the harbour edge - the council control centre is notified via 5G technology, and the local fire and rescue is subsequently called out if required. The lives of two people have already been saved by the technology. It can also create a better organised service where ambulance crew can instantly transmit life-saving details about a patient's condition to awaiting emergency departments. Information, from ultrasound images to blood pressure readings, and from heart rate to body temperature, can be sent to doctors ahead of an ambulance patient's arrival. This technology is not hypothetical – 02 and Vodafone began trialling 5G "smart ambulances" in the East of England and Milan.

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

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Conclusion

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

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

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

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

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

Without this proposed installation, network coverage for Telefonica and Vodafone in this area prevents the customers from accessing the best coverage on their mobile devices, contrary to the operators' license agreement and purposes in which the consumers purchased their mobile handsets, as well as being contrary to the guidance set out in NPPF. It will also be contrary to the aspirations of *Bury Council*, tasked with supporting the delivery of improved digital connectivity by the Department of Digital, Culture, Media and Sports (DCMS).

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

It is concluded that the proposal aligns with both national and local policy in principle and there are no material planning concerns identified at this time that would outweigh these policies. It is believed that the siting and design of the

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proposed new base station, which is the best option available to the operator, is appropriate within the character of the area, and therefore the assumption in favour of sustainable development should be applied and prior approval granted.

Confirmation that submitted drawings have been checked for accuracy

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

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