

**Development Management Officer Report  
Committee Application**

<b>Summary</b>	
<b>Date of Committee:</b> 10 <sup>th</sup> March 2026	
<b>Application ID:</b> LA04/2025/0951/F	
<b>Proposal:</b> Proposed 25m monopole with 6no. antennas, 4no. transmission dishes, 2no. equipment cabinets and ancillary development thereto.	<b>Location:</b> Loughside playing fields, Shore Road, Belfast, BT15 3PZ
<b>Referral Route:</b> The application is made by Belfast City Council and on lands to which the Council has an estate (as per the Scheme of Delegation paragraph 3.8.5 (a)).	
<b>Recommendation:</b> Refusal	
<b>Applicant Name and Address:</b> EE (UK) Ltd & Hutchison 3G UK Ltd Sixth Floor Thames Tower Station Road Reading RG1 1LX	<b>Agent Name and Address:</b> Guy de Rose WHP 1a Station Court Station Road Guiseley Leeds LS20 8EY
<b>Date Valid:</b> 30/06/2025	
<b>Target Date:</b> 13/10/2025	
<b>Contact Officer:</b> Lisa Walshe, Principal Planning Officer	
<p><b>Executive Summary:</b></p> <p>The application seeks planning permission for a 25m monopole lattice tower with 6 no antennae and 4 no dishes as well as associated cabinets and equipment.</p> <p>The site is located within Loughside playing fields, adjacent to the Shore Road. The playing fields are a Council operated site which offers sport pitches and a recreation centre. The topography of the site is broadly level with areas of trees outside the site boundary. An area of hardstanding to the front of the recreation centre serves as the entrance and car park.</p> <p>The monopole will be situated to the rear of the recreation centre and in close proximity to the two playing fields.</p> <p>The site is situated within the development limit as designated under both versions of dBMAP (2004 &amp; 2014). The site is designated open space and has been identified as existing open/recreation space under dBMAP.</p> <p>The Key Issues relevant to consideration of the application are:</p> <ul style="list-style-type: none"> <li>• Principle of Development</li> <li>• Impact on Character and Appearance of Area</li> <li>• Mast sharing and the potential to share existing structures</li> <li>• Impact on Amenity</li> </ul>	

- Health Considerations.
- Road Safety

**Recommendation**

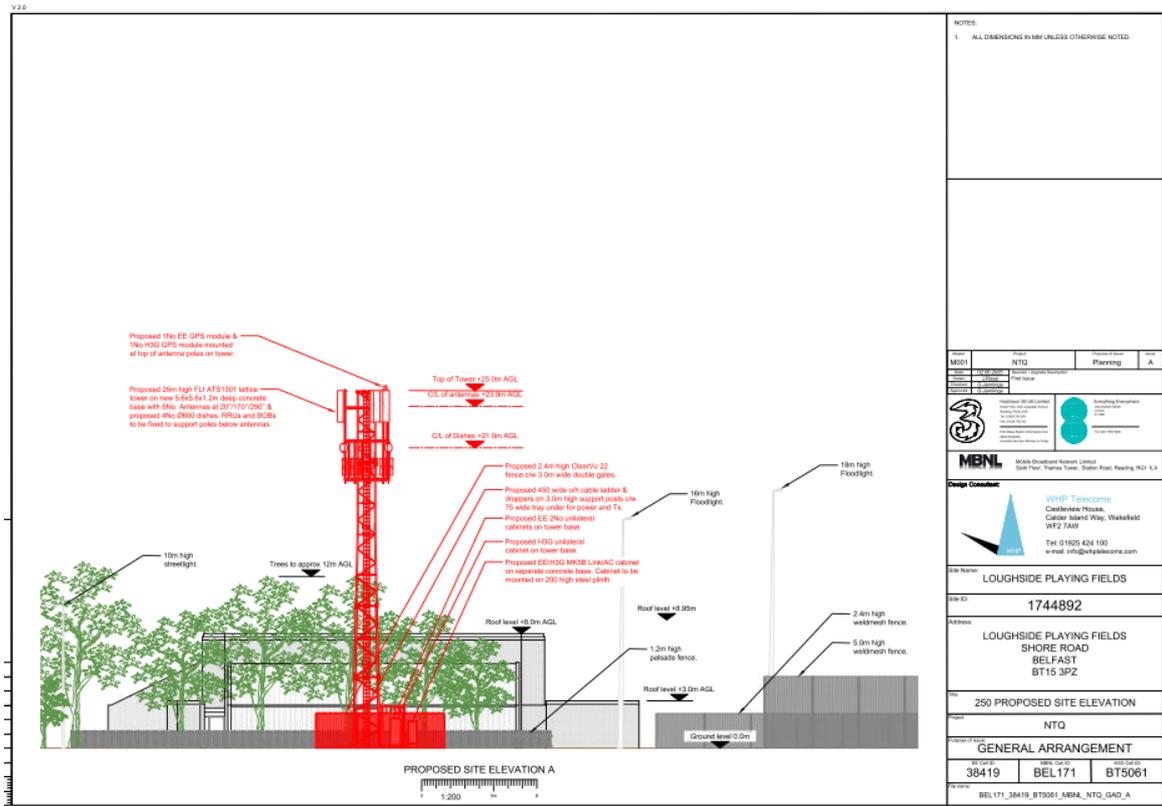
Having regard to the development plan and other considerations, the proposal is unacceptable.

The proposal is contrary to Policies ITU1 and OS1 of the Belfast Local Development Plan: Plan Strategy 2035 as the siting, height, scale and design of the proposal would negatively impact on the area of protected open space and it has not been demonstrated that community benefits would decisively outweigh the loss of the open space.

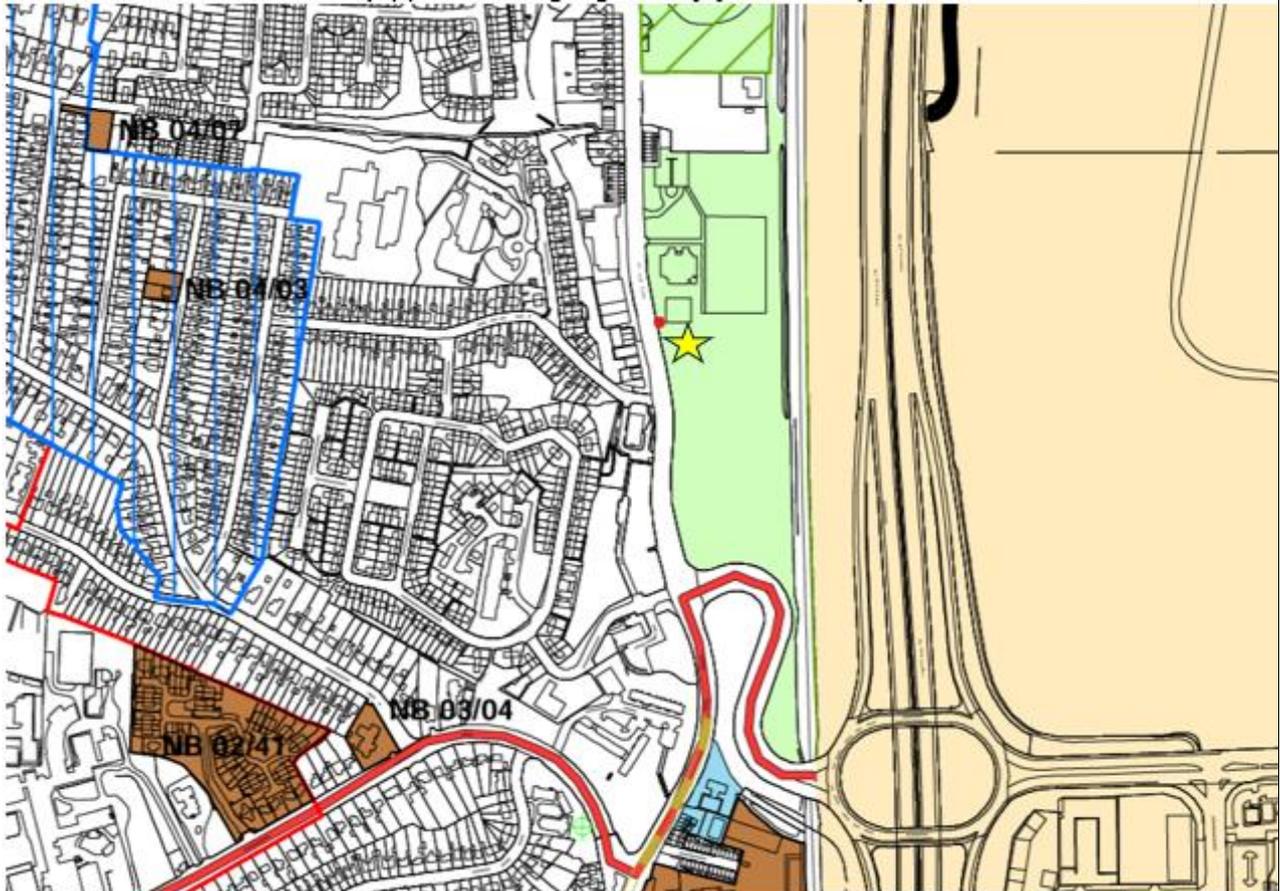
It is recommended that planning permission is refused and delegated authority is sought for the Director of Planning and Building Control to finalise the wording of the refusal reasons and deal with any other issues that arise, provided they are not substantive.



# Proposed Elevation



Extract from Draft BMAP – see key below (Application highlighted by yellow star)



## Key

### For Information Only:

-  Conservation Area
-  Area of Existing Open Space
-  Protected Route
-  Archaeological Site & Monument (State Care)
-  Archaeological Site & Monument (Scheduled)
-  Archaeological Site & Monument (Unscheduled)

## Characteristics of the Site and Area

### 1.0 Description of Proposed Development

- 1.1 The proposal is seeking planning permission for a 25m monopole with 6no. antennas, 4no. transmission dishes, 2no. equipment cabinets and ancillary development.

### 2.0 Description of Site

- 2.1 The proposal is situated to the south of and adjacent to the vacant Loughside Recreation Centre and within the western side of the area of open space adjacent to Shore Road. The centre has been closed to the public since 2020 however the adjoining playing fields remain operational.
- 2.2 There is a band of mature trees along the Shore Road boundary which are the subject of a Tree Preservation Order. Playing facilities including football and hockey pitches are situated immediately to the south and east of the application site. The immediate area on the eastern side of the Shore Road is characterised by open space and recreational uses. The western side of the Shore Road is characterised by commercial uses with residential uses beyond.

## Planning Assessment of Policy and other Material Considerations

### 3.0 Site History

LA04/2023/2665/F – Loughside Recreation Centre, Shore Road, Belfast BT15 4HP. Replacement of existing all weather playing pitch with 3G pitch, new fencing, floodlights and dugouts. Permission granted 03/05/2023.

### 4.0 Policy Framework

#### 4.1 Development Plan Context

Section 6(4) of the Planning (Northern Ireland) Act 2011 states that in making any determinations under the Act, regard is to be had to the local development plan, and the determination must be made in accordance with the plan unless material considerations indicate otherwise.

- 4.2 Section 45(1) of the Act states that in determining planning applications, the Council must have regard to the local development plan, so far as material to the application, and to any other material considerations.

- 4.3 The Belfast Local Development Plan (LDP) when fully completed will replace the Belfast Urban Area Plan 2001 as the statutory Development Plan for the city. The Belfast LDP will comprise two parts. Part 1 is the Plan Strategy, which contains strategic and operational policies and was adopted on 02 May 2023. Part 2 is the Local Policies Plan, which will provide the zonings and proposals maps for Belfast and has not yet been

	<p>published. The zonings and proposals maps in the Belfast Urban Area Plan 2001 remain part of the statutory local development plan until the Local Policies Plan is adopted.</p>
4.4	<p><u>Operational Policies</u> The Plan Strategy contains a range of operational policies relevant to consideration of the application. These are listed at paragraph 3.1.</p>
4.5	<p><u>Proposals Maps</u> Until such time as the Local Policies Plan is adopted, the Council must have regard to the land-use zonings, designations and proposals maps in the Belfast Urban Area Plan 2001 (BUAP), both versions of the draft Belfast Metropolitan Area Plan (v2004 and v2014) (dBMAP) and other relevant area plans. The weight to be afforded to these proposals maps is a matter for the decision maker. It is considered that significant weight should be given to the proposals map in dBMAP 2015 (v2014) given its advanced stage in the development process, save for retail policies that relate to Sprucefield which remain contentious.</p> <ul style="list-style-type: none"> <li>• <b>Belfast Urban Area Plan 2001:</b> The site is located within Lands reserved for Landscape, Amenity or Recreation Use.</li> <li>• <b>Belfast Metropolitan Area Plan 2015 (2004):</b> The site is within an Area of Existing Recreation and Open Space</li> <li>• <b>Belfast Metropolitan Area Plan 2015 (v2014):</b> The site is within an Area of Existing Recreation and Open Space</li> </ul>
4.6	<p><b>Development Plan – Local Development Plan</b> <u>Belfast Local Development Plan, Plan Strategy 2035</u></p> <ul style="list-style-type: none"> <li>• Policy ITU1</li> <li>• Policy OS1</li> </ul>
4.7	<p><b>Strategic Planning Policy Statement for Northern Ireland (2025)</b></p>
4.8	<p><b>Other Considerations</b> DCAN 14 – Sitting and Design of Radio Telecommunications Equipment.</p>
<b>5.0</b>	<p><b>Statutory Consultees Responses</b></p> <ul style="list-style-type: none"> <li>• Belfast City Airport – No objections</li> </ul>
<b>6.0</b>	<p><b>Non Statutory Consultees</b></p> <ul style="list-style-type: none"> <li>• Belfast International Airport – No objections</li> </ul>
<b>7.0</b>	<p><b>Representations</b></p>
7.1	<p>The application has been neighbour notified and advertised in the local press. No third party representations have been received.</p>
<b>8.0</b>	<p><b>Assessment</b></p>
8.1	<p><b>Principle of development</b>  This proposal seeks to enhance connectivity and maximise service provision and supply in this area. The applicant cites the proposal as a replacement mast for existing</p>

	<p>infrastructure on the roof of Ross House which will prevent a coverage gap in the area. The proposal relates to network users of EE.</p>
8.2	<p>The proposal is required to comply with policies ITU1 and OS1 of the Belfast Local Development Plan 2023. ITU1 sets out 8 criteria for telecommunications infrastructure/development. The policy aims are:</p> <ul style="list-style-type: none"> <li>• To facilitate appropriate provision of infrastructure to meet current and featured needs and,</li> <li>• To minimise visual and environmental impacts of infrastructure, telecoms and utilities in order to support sustainable economic growth.</li> </ul>
8.3	<p><b>Policy ITU1 as it pertains to Impact on Character and Appearance of the Area</b>  <b>Criterion (c)</b> - Not result in unacceptable damage to visual amenity or harm to environmentally sensitive features or locations, or heritage features.  <b>Criterion (g)</b> requires details of the consideration given to measures to mitigate the visual and environmental impact of the proposal.</p>
8.4	<p>From the site inspection, the average height of the surrounding buildings on this part of Shore Road was noted. The commercial and residential buildings do not exceed more than 3 storeys for this part of the road. Within the surrounding context, Ross House (Mount Vernon), located to the south west of the site is the only apartment block which does not conform with surrounding character in terms of height. Ross House is proposed to be demolished under the Housing Executive's Action Plan.</p>
8.5	<p>The proposal does not satisfactorily sit within this existing character and will create an overly prominent feature. The height of the proposal far exceeds that of the mature planting and trees, limiting the screening they can provide especially over medium and long distances thus failing criterion (c) of ITU1.</p>
8.6	<p>The proposed 25m lattice tower is directly adjacent to the Shore Road. The western boundary which faces onto the road is screened by mature trees along this route. The Trees are subject to a Tree Protection Order under TPO/2012/0067. Policy ITU1 advises in paragraph 9.1.7 that telecommunication development should avoid any sensitive areas that include any other environmental designations. The site is within a TPO site. Policy TRE1 has a precautionary approach when considering the impacts of a proposed development on trees of visual, biodiversity or amenity quality and significance. Whilst the development is situated away from the tree line, the visual impact is considered significant and will detract from the established tree line which characterises this part of Shore Road.</p>
8.7	<p>The proposal will create a gross area of 75 sqm. The proposal includes ancillary works such as a 2.4m high fence and gates along with 4 transmission dishes and 2 equipment cabinets.</p>
8.8	<p>The mast will be located in an area of open space to the immediate south of the currently vacant recreation centre. The surrounding area is mixed use with commercial and residential uses. The mast will be significantly taller than any other structures in the immediate area. The proposal is 9m taller than existing street lighting. The proposal will be 17m taller than the recreation centre and 14m taller than the tree line. Public views will be open to the mast throughout the park and will be highly visible from the surrounding area.</p>
8.9	<p>The mast will be a dominant feature in the immediate context of the site due to the height and bulkiness of the structure, creating a prominent feature in the surrounding area. The setting of this proposal does not provide a sufficient backdrop to allow the 25m lattice tower to satisfactorily integrate into the streetscape. The proposal will be highly visible</p>

	from various public viewpoints e.g. along the adjacent Shore Road and a significant distance away.
8.10	The proposal has not fully considered potential mitigation measures. The proposal will sit above the existing street lighting by 7-15metres. The proposal is a large and bulky lattice tower which is top heavy with a range of antennae and dishes which are fixed to the tower at its highest point.
8.11	The statement provided by the agent does not adequately demonstrate the proposal will not be an overly dominant feature from public viewpoints. Officers have identified the key public viewpoints which fall along the Shore Road, within the park and the residential street of Loughside Chase and Loughwood Park.
8.12	If permitted the proposal would significantly change the established skyline and would create an unacceptable level of visual clutter which does not integrate with the surrounding.
8.13	The SSRI has provided limited information in regard to mitigation measures to overcome this policy conflict. For the reasons set out above the proposal is contrary to Policy ITU1 criteria (c) & (g).
8.14	<b>Policy ITU1 – other considerations</b>  <b>Criterion (a)</b> – Improve connectivity. The agent has made a statement that the proposal will help improve connectivity, as it serves as a replacement for Ross House to prevent a gap in coverage. Officers have undertaken a desktop assessment and are satisfied criterion (a) will be complied with.
8.15	<b>Criterion (b)</b> – Encourage investment and support the competitiveness of the city. The statement provided by the agent quotes the planning policy framework for England in which “ <i>Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being</i> ”. Officers would not dispute this position; however, the proposal should also comply with the following criteria.
8.16	<b>Criteria (d) &amp; (e)</b> relate to new masts being proposed and will only be acceptable where both requirements are meet,
8.17	<b>Criterion (d)</b> relates to the sharing of an existing mast or other structure has been fully investigated and not feasible.
8.18	ITU 1 requires demonstration of mast sharing and that a new mast represents a “better environmental solution than other options”, under criteria (d) and (e). The SSRI demonstrates the discounted site options.
8.19	The applicant has presented supporting information that alternative sites (25no.) were considered. They were dismissed for various reasons, including, <ul style="list-style-type: none"> <li>• Proximity to residential housing</li> <li>• Ross house re-development scheme</li> <li>• Railway fall distances</li> <li>• Giant’s Park site is up for re-development</li> <li>• Site shares as structures not shareable. Insufficient height available to achieve the required line of sight/ edge of search area.</li> <li>• Structures located in conservation area and issues with Trees</li> <li>• Significant distance away from NTQ site.</li> <li>• Unsuitable for extending the required height.</li> </ul>

8.20	The SSRI concludes that the applicant has taken into account the factors of technical constraints, available sites and planning constraints and consider that the site and design clearly represents the optimum environmental solution.
8.21	The discounted site options have disregarded sites in other locations due to close proximity to residential dwellings. This is not considered appropriate justification as there are many instances of telecoms infrastructure being located within residential areas throughout Belfast. ITU 1 also does not preclude such development from residential areas within the criteria. The council does note there is a weak signal for 5G network coverage in the area.
8.22	The requirement for the 5G Coverage does not outweigh the visual impacts outlined in this report. The lack of clarity and detail regarding the assessment of other sites means the Council cannot be satisfied that the need for a telecoms structure at this location outweighs the visual impact of the proposal.
8.23	Officers are aware of a recent live planning permission under LA04/2023/4526/F which was granted planning permission as an alternative site to the existing Ross House site which can be implemented until 27/04/2010. The applicant has advised the works did not go ahead due to budgeting constraints. Had the proposal been otherwise acceptable, officers could have explored revocation of the extant approval at Ross House, or a Section 76 Planning Agreement to ensure only one of the permissions was enacted. As it stands however, the proposal is not considered to meet key policy tests, and a replacement mast has already been approved.
8.24	<p><b>Criterion (e)</b> requires a new mast to represent a better environmental solution than other options.</p> <p>Little information has been provided by the agent in terms of criterion (e). Officers consider that the best environmental solution would be to implement the permission the applicant has under LA04/2023/4526/F. This would prevent the proliferation of masts within the immediate area.</p>
8.25	<p><b>Criterion (f)</b> requires that the applicant provides information about the purpose and need of the proposal and how it fits into the wider network.</p> <p>The supporting statement details the site selection process and alternative sites for the proposal that have been explored and discounted for various reasons. These elements of the supporting statement aim to satisfy criteria a., b. and f. of Policy ITU 1 of the LDP, in that the proposal would enhance connectivity, encourage investment and competitiveness of the city. The applicant has provided a limited level of information about the purpose and need for this mast.</p>
8.26	The agent has advised mobile phone stations are required as more people are using their network at home, which requires the service to be placed in close proximity to residential properties.
8.27	The agent further contends that proposals are limited as they are required to fit within the existing network. Sites can have a degree of overlapping, however if the overlap is too great unacceptable interference can occur. The proposed development at this site will provide the required service for EE whilst accommodating future users. This feeds back into providing a wider benefit to the economy.
8.28	<b>Criterion (h)</b> has two parts which the proposal must comply with where a base station is proposed a statement:

	<ol style="list-style-type: none"> <li>1. Indicating its location, the height of the antenna, the frequency and modulation characteristics and details of power output.</li> <li>2. Confirmation that the base station when operational will meet the Internal Commission on Non-ionising Radiation Protection (ICNIRP) Guidelines for public exposure to electromagnetic fields.</li> </ol>
8.29	The agent has met the above requirements within the SSRI and the ICNIRP certificate has been submitted as part of this application.
8.30	In relation to air / public safety, Belfast City Airport and Belfast International Airport have been consulted in relation to the height of the structure. Belfast City Airport requested that if 5G was to be enabled, that the applicant should provide clarification of compliance with the Ofcom coordination process.
8.31	The applicant has provided an ICNIRP declaration of compliance. This declaration states that the mast, if erected, would comply with the requirements of radio frequency guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for public exposure. Criteria (h) of policy ITU1 has been complied with, therefore the council offer no objection on this basis.
8.32	<p><b>Loss of Open Space</b></p> <p>The proposal falls within and established area of open space and therefore OS1 is applied. While the proposal pertains to a relatively small area, the general presumption of the policy is for retention of open space unless the lands have been identified in the LDP for alternative uses. The presumption against the loss of open space will apply irrespective of ownership, public access, physical condition or appearance.</p>
8.33	The proposal incorporates the loss of open space to facilitate this development/infrastructure works. Development will only be permitted where exceptional circumstances have been demonstrated. No information to date has been provided to demonstrate that the upgrade in network coverage will bring substantial community benefits that outweigh the loss of open space. Therefore, the proposal is contrary to policy OS1.
8.34	<p><b>Road and Pedestrian Safety</b></p> <p>The proposed monopole and associated ancillary works would be positioned approx. 15 metres from Shore Road ensuring the public footpath remains unobstructed. Given the distance to the footpath and the mature trees acting as a barrier, DFI Roads were not consulted on the application. The installation is not expected to impede pedestrian or vehicular movement.</p>
<b>9.0</b>	<b>Summary of Recommendation:</b>
9.1	The proposal is contrary to Policies ITU 1 and OS 1 of the Belfast Local Development Plan: Plan Strategy 2035. It is recommended to refuse planning permission and delegated authority is sought for the Director of Planning and Building Control to finalise the wording of refusal reasons.
<b>10.0</b>	<b>Draft Refusal Reasons:</b>
	<ol style="list-style-type: none"> <li>1. The proposal fails to satisfy criterion c. of Policy ITU1: Telecommunications Development of the Belfast Local Development Plan: Plan Strategy 2035 in that siting, scale, design and massing of the proposal would result in unacceptable damage to visual amenity and cause harm to the area.</li> </ol>

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|  | <ol style="list-style-type: none"><li data-bbox="336 228 1426 427">2. The proposal fails to satisfy criteria e. and g. of Policy ITU1: Telecommunications Development of the Belfast Local Development Plan: Plan Strategy as it has not been demonstrated that a new mast represents a better environmental solution than other options, and that adequate details have been considered to mitigate the visual and environmental impact of the proposal at this location.</li><li data-bbox="336 465 1426 600">3. The proposal fails to satisfy Policy OS1 of the Belfast Local Development Plan: Plan Strategy 2035 in that it has not been demonstrated that the loss of open space will be decisively outweighed by delivering substantial community benefits.</li><li data-bbox="336 638 1426 871">4. The proposal fails to satisfy Policy OS1 of the Belfast Local Development Plan: Plan Strategy 2035 in that it has not been demonstrated that the proposal will protect the character and amenity value of the protected area of open space and no alternative provision has been proposed nor has it been demonstrated that retention/enhancement of the existing open space/recreational facilities can only be achieved by the development of part of a small part of the existing space.</li></ol> |
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