SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Cowcliffe and Netheroyd Hill Liberal Club	Site Address:	Land at Cowcliffe and Netheroyd Hill Liberal Club, 181 Netheroyd Hill Road, Cowcliffe, Huddersfield, HD2 2NG
National Grid Reference:	E: 414122 N: 419015		
Site Ref Number:	CTIL 116060_23	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: Kirklees Council do not have a publicly accessible mast register.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	12/04/2023
Name of contact:	John Holmes

[1] Macro or Micro

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Summary of outcome/Main issues raised: A pre-application consultation letter and copy of the proposal drawings were sent to the Chief Planning Officer at the Local Planning Authority by email on 12/04/2023. John Holmes responded on 19/04/2023, stating: *"The proposal, being for a pole approx 20m in height (replacing one 12.5m in height) would be of greater prominence within the locality/street, although I acknowledge it would replace existing infrastructure."*

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstone's commercial relationship with VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means they 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. Cornerstone aim to engage and work with the planning department at the earliest opportunity from when they are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. Cornerstone 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: A pre-application consultation letter and copy of the proposal drawings were sent to the local Councillors for the Ashbrow ward (Councillors James Homewood and Amanda Pinnock) and the local MP Barry Sheerman, by email on 12/04/2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence): No comments received to date.			

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School/College

Location of site in relation to school/college (include name of school/college): N/A
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: The site is not located in any known civil or defence safeguarding area.		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	A Developer's Notice and copy of the proposal drawings were sent to the landowner by Special Delivery on 09/05/2023. A copy of the Developer's Notice and proof of delivery have been enclosed with the 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

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As part of VMO2's continued network improvement program, there is a specific requirement for an upgrade to the existing installation at this location to provide improved 2G, 3G, 4G and new 5G coverage and capacity, ensuring that this area of Cowcliffe has access to the latest technologies.

The proposal comprises of the removal and replacement of the existing 12.5 metre high monopole, supporting 3 no. antennas within a shroud, with an upgraded 20 metre high monopole, supporting 6 no. antennas. The upgraded monopole will allow for the necessary capacity upgrades and new 5G coverage to be provided to the area.

The existing monopole also hosts floodlights and a security camera, which cannot be installed on the new monopole for structural reasons. As such, a new lighting tower will be installed, which will host the floodlights and security camera. This ensures that illumination levels and security are maintained at this location.

The proposal also comprises the removal and replacement of 3 no. existing equipment cabinets with 2 no. upgraded equipment cabinets.

The site is located adjacent to the bowling green building in the north western corner of the bowling green to the rear of Cowcliffe and Netheroyd Hill Liberal Club. Cowcliffe itself is a predominantly residential area, with large open areas found on the steep side of the valley in this area to the north of Huddersfield. The immediate terrain comprises a number of steep sloping roads running off in different directions, which presents difficulty in trying to achieve continual mobile network coverage in this area. There are a number of vertical elements of street furniture in the surrounding area, such as street lighting columns, telegraph poles and floodlights within the bowling club, which will allow the proposed equipment to assimilate into the streetscene.

The upgrade of an existing site is in full compliance with local and national policy, which advises that operators should take a sequential approach and always look to upgrade existing sites first before seeking new installations.

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

The operator is seeking to upgrade the existing coverage provided from the existing radio base station at Cowcliffe and Netheroyd Hill Liberal Club, to enable enhanced 4G coverage and capacity to the surrounding area, as well as new 5G services for VMO2, to ensure high quality customer experience is obtained as demands on the network increase and technologies change.

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

Description:
The removal and replacement of the existing 12.5 metre high monopole, supporting 3 no. antennas within a shroud, floodlights and security camera, with an upgraded 20 metre high monopole supporting 6 no. antennas, and a new lighting tower supporting floodlights and a security camera, the removal and replacement of 3 no. existing equipment cabinets with 2 no. upgraded equipment cabinets, and ancillary development thereto, including the installation of a GPS node.

Overall Height: 20 metres	
Height of existing building *(where applicable)*:	N/A
Equipment Housing: York	
Length:	0.6 Metres
Width:	1.90 Metres
Height:	1.75 Metres
Equipment Housing: Shire	
Length:	0.6 Metres
Width:	1.05 Metres
Height:	1.75 Metres

Materials *(as applicable)*:	
Tower/mast etc – type of material and external colour:	Steel – Grey
Equipment housing – type of material and external colour:	Steel – Grey

Reasons for choice of design, making reference to pre-application responses:
The operator has carefully considered the design of the upgraded column. The operator is proposing the most sensitive design currently available to provide the necessary coverage and capacity to the surrounding area. Due to all the technologies that will be available at this location, 2G, 3G, 4G and 5G, 6 antennas need to be installed at the top of the slim-line monopole. These are split into a dual stack formation where 3 antennas will be located at the top and the other 3 will be located underneath. The 3 upper antennas will provide enhanced 2G, 3G and 4G service provision. The 3 lower antennas will provide new 5G service provision. This makes the bottom antennas 3.47m lower than the top of the pole. Thus if the column were to be any lower, the antennas would not be able to operate effectively. The proposed height at 20m is essential in order to provide sufficient coverage and capacity to the target coverage area. The latest 4G and 5G radio technologies operate in higher frequency bands than older technologies. Since they operate 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 an increase in antenna height for the latest 4G and 5G service provision.

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It is noted that the Local Planning Authority, in their pre-application advice, acknowledged that the replacement pole would be of a greater height and thus a greater prominence within the locality/street. However, they did also note that it would replace existing infrastructure.

The antennas are all unshrouded for technical reasons. However, they have been designed to be as tight as possible and virtually the same width as the main column, to minimise their visual appearance. The higher the radio frequency the more signal attenuation there is. The higher frequency of 4G and 5G antennas are unable to operate effectively through the Glass Reinforced Plastic that the shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area. An additional installation would be needed elsewhere within the cell area, leading to the proliferation of masts.

This is the slimmest design possible which will enable all technologies to be supported from this site. If the column width were to be any slimmer then the technology would not fit on the one column and another radio base station would be required, which would lead to the proliferation of masts contrary to national Government guidance set out in the NPPF and The Code of Practice. Similarly if the column were to be a uniform width throughout then the overall width would have to increase which would appear more visually prominent in the streetscene, than the proposed design.

The proposed design is more visually sensitive and much easier to assimilate into a streetscene than lattice towers with bulky headframes. These non-stealth designs are preferred by operators as they are structurally capable of hosting more equipment and give greater scope for antenna orientation and are thus more efficient structures. However, such designs would appear alien in this location. Therefore, the operator has compromised on obtaining maximum coverage in order to better assimilate in to the streetscene.

The design of the column resembles as closely as possible the existing column and other existing vertical structures within the immediate area including the street light columns, telegraph poles and floodlight columns. These vertical structures will help the proposed installation assimilate with the surrounding area.

The design of the column represents a simple, functional, vertical structure which will not appear incongruous within the streetscene. This is especially so given its careful siting near to a number of existing perpendicular items of street furniture on and around Netheroyd Hill Road which help the column assimilate with its surroundings and not appear out of place. The column is proposed to be coloured Grey, although it can be coloured any other colour the LPA consider appropriate if necessary. It is considered that this colour is preferable as it will allow the column to blend into the typically grey British skyline and it matches the existing pole.

In addition to the replacement monopole, it is proposed to install a new lighting tower, which will host the existing floodlights and security camera. The tower will be the same height and colour as the existing lighting towers around the bowling green.

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The cabinets are designed to appear like other statutory undertaker's equipment cabinets. The proposed equipment cabinets are small for telecommunications apparatus and are proposed to be coloured Grey. The equipment cabinets can be installed under the operators permitted development rights but have been included on the plans and in the description in order to remain fully transparent. The cabinets can be painted any other colour the LPA consider appropriate if necessary.

The RRUs will be located below the proposed antennas on to the new monopole. They are small, each one about the size of a shoe box. They are designed to make the antennas more efficient and reduce the amount of ground based equipment cabinets thus minimising the visual impact on the surrounding area. Given their height above ground level underneath the antennas, at approximately 16 metres, they will not be overly prominent in the streetscene.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents 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 this proposal, to provide improved 2G, 3G and 4G, and new 5G service provision for VMO2, ensuring high quality dense coverage and capacity, would not appear out of place within the streetscene.

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, VMO2 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 VMO2'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

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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.

The telecommunications infrastructure the subject of this application accords with all relevant legislation 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 upgrade the existing radio base station at this location to allow VMO2 to provide improved 2G, 3G and 4G coverage and capacity in and around Cowcliffe whilst also allowing the operator to provide the latest 5G service provision to the local area. This ensures high quality indoor service provision is maintained.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

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).

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Site Type	Site name and address	National Grid Reference	Reason for not choosing site
N/A	N/A	N/A	N/A

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

As referred to above, the applicant has taken a sequential approach and is seeking to upgrade the existing established telecommunications site. This is fully in line with local and national policy.

These amendments to the existing radio base station will ensure that the latest superfast technologies will be able to be accessed by users in this area, in line with the operator's legal license obligations, and the Government's aspirations that everyone has access to the latest information super highway network and the customers' expectations that their handheld devices are able to operate wherever they are located whether that be indoors or outside.

It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and appearance of the surrounding area. Given the makeup of the area and the siting of existing telecoms infrastructure on the site, it was established that the upgrading of facilities through the use of existing infrastructure would be the most viable solution. The surrounding area is predominantly residential and due to the topography of the area, the existing site location is the optimum solution for providing coverage to the whole of the target coverage area. Based on this sequential approach no other sites have been considered.

Land use planning designations:

No relevant land use designations identified.

The site is located within Flood Zone 1, and therefore has a low probability of flooding from rivers and the sea. As the site is less than 1 hectare, it is not considered that a Flood Risk Assessment is required.

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

National Planning Guidance

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions.

It is not necessary to quote extensively from this document but the following points are highlighted.

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National Planning Policy Framework (July 2021)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high quality communications. Indeed, a whole chapter is dedicated to high quality communications, emphasising the importance that the Government attaches to digital connectivity. Paragraph 114 states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. This wording echoes guidance set out in paragraph 42 of the 2012 version of NPPF. However, it also includes the importance of *reliable* communications infrastructure for both economic growth *and social well-being*.

The NPPF continues to support the expansion of electronic communications networks at paragraph 114. It notes that policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. The economic and social benefits of providing high quality and reliable communications infrastructure are well documented and can be found later in this Supporting Information Statement.

The NPPF makes reference to 5G:

'*Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)…*'

With the above in mind, the Government is already forward thinking the evolution of data networks and seeks planning decisions to take account of this. 5G technology provides increased speed of data and more capacity in the network, to ensure that handheld devices can continue to be used for the purposes in which they were purchased. This will bring even greater economic and social benefits to the area.

Paragraph 115 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 118 of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic

communications system, or set health safeguards different from the 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 or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 38 it 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 conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.*

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 81 states:

> *'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 in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation[42]'…*

Footnote 42 of the NPPF states:

'The Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future'.

Code of Practice for Wireless Network Development in England

The Code of Practice provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other

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relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. It is also a useful tool for other interested stakeholders such as community groups, amenity bodies and individuals with an interest in mobile connectivity.

The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The Code of Practice covers all forms of wireless infrastructure development, including mobile masts and cabinets. It is recommended that other wireless communications operators follow the principles of this Code of Practice, where appropriate.

Unlike previous iterations this Code of Practice has been led by the Department for Digital, Culture, Media and Sport (DCMS) and developed in collaboration with representatives of the mobile network industry, other government departments and public bodies, local planning authorities, and protected landscapes. This document replaces the previous Code of Best Practice on Mobile Network Development, which was published in 2016 and is now published by DCMS.

The CoP sets out the legal and policy framework for the delivery of wireless infrastructure development.

Paragraph 8 of the revised Code acknowledges that connectivity is vital to enable people to stay connected and that fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code continues to acknowledge that as the demand for mobile data in the United Kingdom is increasing rapidly, and that it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Government recognises the role of Planning in delivering the digital infrastructure that we need, in a sustainable and well-designed way, especially as households and businesses become increasingly reliant on mobile connectivity.

Paragraph 13 of the Code continues to echo the NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth. More specifically that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technologies (such as 5G) in order to support economic growth across the country.

The CoP sets outs 'How wireless networks function.

Para. 16 states "*Cellular wireless networks use base stations to provide an area of radio coverage. Wireless technology uses the radio spectrum to broadcast radio waves between base stations and devices. Different radio frequencies have different characteristics which, along with the density of cell site locations, affect the extent of coverage and how much*

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data can be carried over the network. Depending on the radio frequencies used, base stations can deliver coverage over a wide area or provide extra network capacity in areas where there is a high demand for network bandwidth".

Para. 17 sets out that *"Wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications".*

The CoP establishes 'Principles and commitments' by which operators should develop their networks and that Local Planning Authorities should demonstrate their support by.

Para. 18 states *"Operators should develop their networks and install wireless infrastructure according to the following principles and commitments:*

- ***Site sharing and use of existing infrastructure**: make use of existing structures, sites and masts wherever possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.*
- ***Consultation with local planning authorities, local communities and other stakeholders**: participate in dialogue with local planning authorities, along with other relevant stakeholders such as the highways authorities, Area of Outstanding Natural Beauty bodies, Historic England, and Natural England, including pre-application discussions, where appropriate. Maintain clear procedures, and high quality communication and consultation with local communities and other interested parties. Operators should agree community engagement with local planning authorities and share information as appropriate (see Pre-application consultation with local communities below).*
- ***Standardised and high-quality approach to planning applications, and the notification procedure**: provide standardised supporting documentation for planning applications (where appropriate) within the context of national and local requirements. Ensure planning submissions are of high-quality and provide the necessary evidence to support the application (as per the NPPF).*
- ***Prompt responses to enquiries**: respond to complaints and enquiries within a timely manner (see Review and Enquiries section below).*
- ***Siting and Design**: wireless infrastructure should be deployed in accordance with the guidance set out within this Code of Practice. Where appropriate, equipment should comply with the principles set out in the NPPF and consider any local planning policies, including any local and national design codes. When located in*

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protected landscapes and other designated land, the sensitive nature of these areas must be considered.

- ***Removal of redundant equipment and site restoration:*** *ensure that when infrastructure is upgraded, any equipment that is made redundant by the upgrade, such as brackets, is removed to benefit the local environment. Where a whole site is no longer in use, the site should be restored to its original state.*
- ***Compliance with guidance laid out in the International Commission on Non-Ionizing Radiation Protection (ICNIRP) public exposure levels guidance****: as required by spectrum licences, comply with international guidelines for limiting exposure to electromagnetic fields (EMF) - including, as set out in the NPPF, providing a statement that self-certifies that ICNIRP guidelines will be met with all applications (see Annex C).*

Paragraph 19 states that Local Planning Authorities should demonstrate their support by:

- ***"Incentivising connectivity****: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.*
- ***Facilitating sites****: engage with operators when new sites have been proposed and discuss site requirements.*
- ***Engagement with operators****: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.*
- ***Information and communication****: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives)".*

The added emphasis on support from Local Planning Authorities in the deployment in digital infrastructure is even more evident in the revised CoP. The CoP recognises the importance of collaboration and partnership to help drive network coverage across the country. It goes on to state that *'In all instances, it is important for all parties involved in the process to take a positive approach to consultation and engagement'.*

Siting and Design Principles

The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. The CoP acknowledges that *'good siting and design principles should apply to all wireless network development and take into account any site specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities'.*

The Code provides guidance on siting and appearance principles. It sets out several design principles in respect of telecommunications development and acknowledges that the

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options for design used by an operator will be affected by site conditions including requirements to link the site to the network, landscape features and coverage and capacity requirements. The guidance includes at Para. 22 *'the choice over the site selection and design of equipment is primarily dependent upon the coverage and capacity requirements and technical constraints of a specific location, although operators should make efforts to reduce visual impacts where possible'*.

Para. 23 confirms that there should be a ***'presumption in favour of facilitating sustainable network development'*** and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and find viable solutions to deployment issues (emphasis added).

Paragraphs 24 - 27 sets out general siting and site selection principles which Operators should consider. The CoP acknowledges at Para. 24 that *'Operators use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G, 4G and now 5G. Once an operator has identified a requirement for a new cell site, a suitable site needs to be found. Elements that make a site favourable include: having existing or ready access to a power supply, access to fibre optic cables, vehicular access, and, other buildings and development which may provide a level of existing screening. Operators will typically look to upgrade existing infrastructure prior to considering a new deployment, in particular for initial 5G deployment'*.

Para 25 notes that *'When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:*

- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'*.

Para. 26 highlights that the installation of all wireless infrastructure requires a balanced approach between the technical needs and constraints of the proposed site and the potential impact of the development. The three key technical and operational considerations for installation sites are:

- **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 the demand for network capacity in a particular area, additional sites may be required within

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that coverage area to meet the demand. This is more likely to be required in densely populated areas or areas of high footfall.

- **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.

Para 27 requires that Local Planning Authorities consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. Para. 27 further considers that 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

In respect of 'Design', the CoP at Para 28 acknowledges that the siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact including

- **Protecting visual amenity**
- **Mitigating visual impacts**

Para. 29 acknowledges that these factors along with location and the coverage and capacity requirements can influence the type of infrastructure structure that is deployed and requires that '*planning authorities should be aware of these constraints when considering proposals. In particular:*

- *In urban areas, where there is a high level of demand for mobile data, mobile base stations are likely to need to be deployed more densely. In these settings you can expect to see more use of streetwork monopoles and rooftop installations and, in future, we are likely to see a larger number of smaller units (so-called "small cells") deployed on buildings and on street furniture.*
- *In rural areas, base stations often need to cover wider geographic areas. Operators may need to use tall masts or lattice towers to provide the required coverage. The location of masts can sometimes be dictated by access to transmission links back to the operator's main network and proximity to a power supply. Coverage in some areas can be limited because of the geography, topography and terrain'.*

The CoP establishes radio equipment housing (cabinets) principles. The CoP at Para. 30 states that "*cabinets protect radio transmitters and receivers, provide the power source for mobile equipment, and are connected to antennas via cables. Equipment cabinets are likely to be needed at most sites. The cabinets must be of sufficient size to facilitate hosting various operating equipment whilst also allowing air circulation to reduce the potential for overheating*". The CoP establishes the planning and visual considerations for siting radio housing. These include:

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- Colouring
- Siting on highways and footways:
- Highway safety:
- Listed buildings/ scheduled monuments and Conservation Areas:
- Access
- Trees

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Local Plan for the Kirklees area comprises:

- Kirklees Local Plan Strategy and Policies (2019)
- Kirklees Local Plan Allocations and Designations (2019)

Kirklees Local Plan Strategy and Policies (February 2019)

The Kirklees Local Plan Strategy and Policies was adopted by Full Council on 27 February 2019. It now forms the council's development plan and sets the planning policies under which development control decisions will be taken.

The Kirklees Local Plan sets out the policies necessary to achieve the strategy and how much new development there should be in the district, and where it should go. There are no specific policies within the Local Plan which relate solely to telecommunications development, but there are numerous policies relating to the provision of well-designed communications networks, drawing the link between digital infrastructure and sustainable economic development.

Policy LP1

Presumption in favour of sustainable development - when considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Policy LP4

Providing Infrastructure - states that the council will work with partners to bring forward the necessary and proportionate essential and desirable infrastructure that is required in order to deliver the spatial strategy as set out in the Local Plan.

Policy LP24

Relates to design and outlines that proposals should promote good design. This can be achieved by, amongst other things, ensuring that the form, scale, layout and details of all development respects and enhances the character of the townscape.

Supporting paragraph 11.8 of Policy LP24 discusses telecommunications infrastructure directly and outlines that this should be capable of accommodating changes in technological requirements without having a negative impact on the streetscene.

Kirklees Economic Strategy 2019-2025

Vision for the region:

This strategy builds on the strength of Kirklees' many distinctive places – from the large towns of Huddersfield and Dewsbury to a wealth of smaller towns, villages and valleys. This combination of assets, and our excellent location at the centre of the Leeds, Manchester and Sheffield city regions, add up to leading businesses, many skilled people, an excellent university, a strong leisure and tourism offer, a high quality of life and a diverse housing offer upon which to build.

The strategy focuses on creating sustained economic growth and providing good employment for and with communities and businesses. It aligns to the Kirklees Local Plan and is supported by other strategies that have a fundamental impact on our economy, including the Digital Plan and Housing Strategy, and the forthcoming Inward Investment Plan. It is also instrumental to the shared outcome of supporting people in Kirklees to have aspiration to achieve their ambitions through education, training employment and lifelong learning and it sets the context for the Learning and Post-16 Employment and Skills Plans.

Kirklees Economic Strategy consist of multiple priorities set for the region. Priority 4 discuss the importance of the digital connectivity:

Advanced Connectivity and Infrastructure - securing and maximising benefits from the Transpennine rail upgrade, a Huddersfield-North Kirklees-Leeds Inclusive Growth Corridor, 10,000 new homes and excellent digital and green infrastructure.

The Long Term Outcome:

High-speed, reliable internet access and above average uptake; faster rail travel; more journeys by public transport and active travel; increased housing numbers and affordability. To deliver an inclusive and productive economy we need to ensure all of Kirklees has the highest standards of connectivity and infrastructure. This includes not just road investment but

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public transport, active travel and modal shift to support the quality of our places, health, inclusion and air quality, safe, joined up cycling/walking routes and facilities and digital connectivity. We want to improve the speed and capacity of services on key corridors, especially those connecting Huddersfield and North Kirklees to each other and to Leeds and Manchester, and faster, more frequent services to Sheffield and directly to London.

Action Programme 9: Secure Top Class Digital Infrastructure And Its Application:

We will deliver the Kirklees Digital Plan and associated activity to support digital infrastructure and the digital economy more broadly in both our busiest towns and our most rural communities.

This will include:

- Maximising gigabit, Superfast, Ultrafast, Mobile and WiFi access across all geographical areas, including establishing free WiFi in Huddersfield, Dewsbury and Holmfirth
- Removing barriers to digital infrastructure investment and planning for infrastructure growth by determining sites for data centres, masts and aerial infrastructure in advance of demand
- Ensuring digital infrastructure expansion and provision is at the heart of planning applications and transport schemes
- Action to promote the use of digital as part of modern business practice; building digital skills and inclusion; and facilitating digital sector growth

Action Programme 12: South Kirklees And Rural Areas:

We will facilitate action that allows small towns, villages and rural areas to fulfil their potential, to promote themselves positively and to maximise connections between their success and that of Huddersfield and North Kirklees.

This will include:

- Improving digital connectivity and exploiting opportunities in the sector.

West Yorkshire Combined Authority – Leeds City Region Digital Framework

The West Yorkshire Combined Authority's membership is made up of democratically elected councillors from the West Yorkshire councils of Bradford, Calderdale, Kirklees, Leeds and Wakefield, plus York and the Chair of the LEP.

The Leeds City Region Digital Framework sets out four key challenges facing the City Region which are currently holding back the economy and constraining growth. It identifies that to tackle these challenges, digital technologies can aid businesses to become more productive and give them the opportunity to exploit new digital technologies to drive product and process innovation. It also acknowledges that closing the 'digital gap' will help to ensure that everyone can access the same opportunities in employment, lifestyle and learning through

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the use of digital technologies, and will reduce the current divide between the 'haves' and 'have nots'.

The Digital Framework identifies 5G as an aspect of world class digital infrastructure, and the City Region wishes to action a regional response to the opportunities that 5G will bring, particularly around demonstrable health use cases.

West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036 (May 2016)

The Vision of Leeds City Region SEP is:

To be a globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone.

The Leeds City Region SEP recognises the benefits of the new digital technologies, as well as the need to improve infrastructure required by them:

High quality digital infrastructure supports all priorities of this strategy. Schemes such as Super Connected Cities and Superfast West Yorkshire and York, as well as North Yorkshire projects, continue to deliver major digital infrastructure improvements. But we want to go further still to ensure no business – in urban or rural areas – faces digital disadvantage that holds back growth and perpetuates exclusion.

Currently, superfast broadband coverage sits at around 96%, with an ambition and infrastructure programmes in place to reach 99% by 2018/19. However, this is about more than infrastructure. We want to go further and faster to ensure that Leeds City Region fully capitalises upon the capacity of rapid digital technology advances and open data, aligned to the capacity of businesses to deliver investment and productivity improvements, and opportunities to transform outcomes for residents – such as on health, transport and education.

Online Nation 2022 Report

Online Nation is an annual research report, published for the first time in 2019. Using research produced by Ofcom and others, it looks at what people in the UK are doing online, how they are served by online content providers and platforms, and their attitudes to and experiences of using the internet.

The latest Online Nation 2022 report (published June 2022) found that for most people in the UK, being online is a major part of daily life. Being online allows people to connect with others, sometimes in ways they may not be able to do offline. Data shows how we benefit from a range of online services, from messaging and calling platforms to gaming platforms, online news outlets and online shopping.

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The Meta-Owned social media apps (Facebook, Instagram, Whatsapp and Facebook Messenger) made up the top four smartphone apps most visited daily by UK adults in September 2021. The top-reaching smartphone app was Whatsapp (88% of UK online smartphone using adults) closely followed by the Facebook app (87%).

94% of UK adult internet users aged 16+ said they used an online communications service for making voice/video calls or sending messages in 2021, and 80% of children aged 3-15 did the same.

The 2022 report found that the UK adult internet users spent almost 4 hours online a day in September 2021, with 3 of those hours being spent on smartphones. One in five people only use a smartphone to go online compared to one in ten last year. News and government public services are among the most-visited websites and apps in the UK.

The majority (67%) of UK internet users aged 13+ feel that the benefits of being online outweigh the risks. 43% agree that being online has an overall positive impact on their mental health.

The report found that 60% of children aged 8-15 say that using social media and messaging platforms makes them feel closer to their friends. More than three-quarters of children aged 12-15 said that being online can help with their school/homework, whilst half said it can be used to learn a new skill.

The Online Nation 2022 report acknowledged that the global pandemic since March 2020 has resulted in significant changes in online behaviour. Online shopping habits developed during the lockdown periods have remained. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increased spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online.

Figure 1.2 of the Online Nation 2022 report indicates that the percentage of UK online adlts accessing the internet, by device, in 2021 was the highest by smartphone at 88%. In September 2021 73% of the time spent online by UK adults per day was on a smartphone.

Figure 1.2: Percentage of UK online adults accessing the internet, by device: 2021

Percentage of adult internet users	Smartphone	Tablet	Laptop	Smartphone only
2021	88%	43%	53%	21%

Source: Ofcom Adults' Media Literacy Tracker 2021: Core survey and CATI omnibus survey. IN1. Which of these devices do you use to go online? (MULTI CODE) Base: All adults 16+ that go online (at home or elsewhere) (excluding those who did not give a response at the postal survey) (3577)

Reproduced from Online Nation 2022 Report

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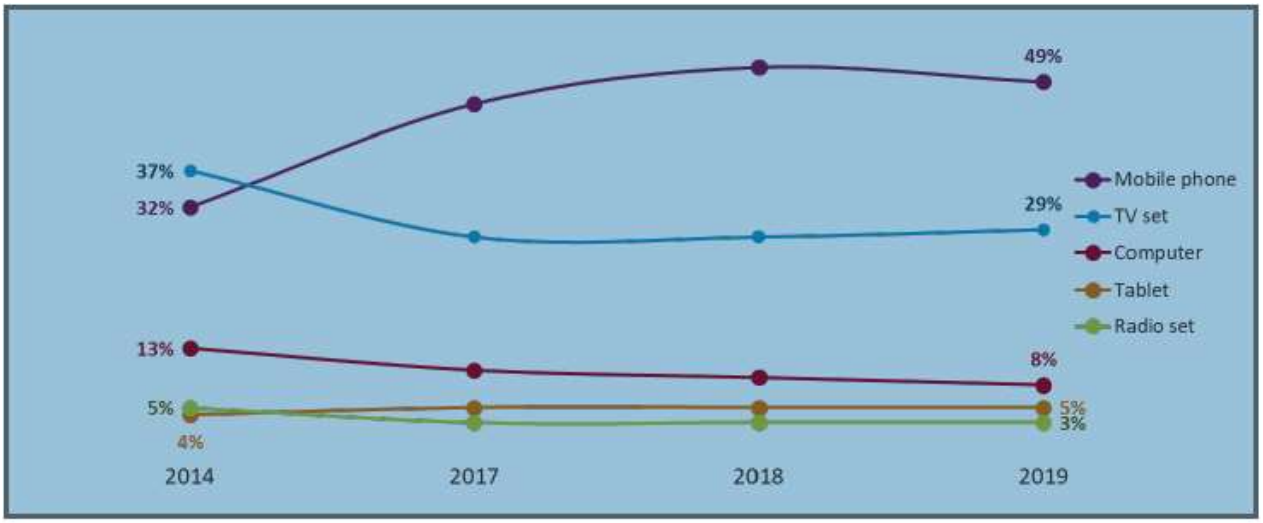
Other relevant information

The table below, taken from Ofcom Adults' Media Literacy Tracker, indicates the most-missed device among adults were it be taken away from them, using data collected 2014-2019. As can be seen, nearly half of all adults say that their mobile device is the device they would miss the most were it taken away from them.



Source: Ofcom Adults' Media Literacy Tracker 2014-2019

More people than ever now rely on their mobile phones for day to day, and even hour to hour, access to services. For example, some people use their mobile phones to monitor their health, such as diabetics. Mobile phones can be a lifesaver in that sense, just as much as being able to call 999 in an emergency.

Levelling Up the United Kingdom (February 2022)

Digital Connectivity is a focus area and the mission is 'By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population'.

Chapter 3 - The Policy Programme:

Para 3.2.4 - By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population

This mission is focused on improving digital connectivity.

Digital connectivity: The case for action

The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities

through remote working. However, there are significant spatial disparities in the quality of broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas. Infrastructure is only part of the picture: economic benefits will only materialise if businesses and workers have the skills to take advantage of improved infrastructure.

More broadly, high quality digital infrastructure can deepen local labour markets through remote working, making it more attractive for both workers and companies to locate regionally. It also allows for the development of high-value sectoral clusters, which can drive growth and jobs in new areas. Existing specialisms in the UK regions have the potential to generate strong tech clusters, such as fntech in Scotland and Wales, e-Commerce in the North West and Northern Ireland, and Agri-Tech in Yorkshire and the Humber. The sector also provides opportunities for raising living standards – median earnings for the sector are 50% higher than the UK average.

The policy programme In 2020, the UK Government published the National Infrastructure Strategy, committing to providing £5bn in public funding to roll out gigabit broadband to at least 85% of the country by 2025, and subsequently to as close to 100% as possible, working with the private sector.

Public investment will target premises that are hardest to reach and which would otherwise not be provided for by the private sector, ensuring no areas are left behind. Gigabit coverage has increased from 10% to over 60% in less than two years. Since 2019, coverage has improved across the UK, and the UK Government anticipates the following additional improvements to be delivered as a minimum by 2025, as set out below.

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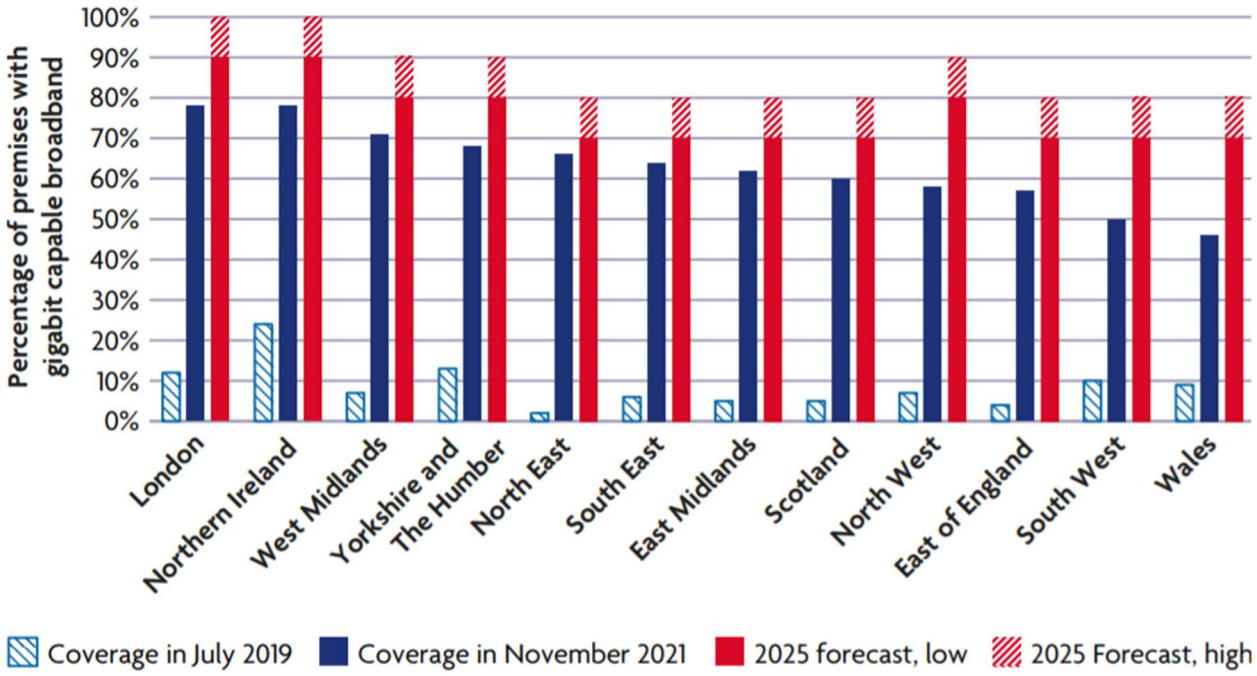
Figure 3.1 Gigabit coverage improvements, UK countries and regions, 2019, 2021 and 2025 (forecast)



Source: Levelling Up the United Kingdom.

5G has the potential to radically change the way people live and make businesses more productive and competitive. The UK Government's ambition is for the majority of the population to have access to a 5G signal by 2027. Since 2017, the UK Government has provided £200m in funding for 5G Testbeds and Trials, supporting over 200 startups and SMEs across a range of sectors – including healthcare, manufacturing, Agri-Tech and creative industries – to better understand how to use the technology to develop new solutions and services.

In 2022, the UK Government will publish the Wireless Infrastructure Strategy. This will review how far the private sector will go to deliver wireless infrastructure – including 5G – across the country, and determine whether there are any market failures in places that need to be addressed, and how the UK Government could tackle these.

Box 3.9 - West Midlands 5G The West Midlands 5G (WM5G) Testbed started in 2018 with the mission of testing and proving the benefits of 5G to public and private sector productivity, creating jobs and boosting growth. The UK Government has invested £21m over three years, alongside investment from local government and the private sector. By working with local authorities and Mobile Network Operators (MNOs), WM5G has accelerated 5G deployment by over six months, resulting in the West Midlands being amongst the best connected places for 5G in the UK. In addition, WM5G has delivered a number of UK firsts, including a 5G road sensor network, 5G connected ambulance and capsule endoscopy trials, and a 5G application accelerator programme called 5prinG, which has already upskilled over 400

organisations on the benefits of 5G and allowed over 60 start-ups to develop new 5G products and services.

We must ensure that people have sufficient digital skills to reap the benefits and prosperity arising from the digital economy. In 2020, the UK Government introduced a new digital skills entitlement, giving adults with low or no digital skills in England free access to new digital skills qualifications based on employer-supported national standards. The UK Government continues to work with local leaders to develop Local Digital Skills Partnerships. These collaborative partnerships are now operating in seven regions across England, with an eighth formally launching in Hull and East Yorkshire in early March. The UK Government will work with devolved administrations to consider how best to share the insights and evaluation of the programme to help build digital skills capability across the UK.

UK Wireless Infrastructure Strategy (April 2023)

The UK Wireless Infrastructure Strategy, published in April 2023 aims to achieve the objectives that have been set out by the UK Government. The next decade will see seismic changes both in terms of what wireless connectivity can deliver and how we can use it. The economic and social benefits from these changes promise to be vast, from supercharging growth to accelerating our transition to net zero. But these benefits can only be achieved with concerted action from government, industry, and others. This strategy sets out the Government plan to do that.

In the last 5 years, UK government policies have driven impressive progress in the deployment of world class fixed and wireless networks across the whole of the UK, removing regulatory and practical barriers to deliver stronger growth, more jobs, and better public services in every corner of the country.

- through our £1 billion deal with the mobile network operators, we are supporting rural communities by ensuring that 95% of the UK landmass have 4G coverage by 2025. This currently stands at 92%
- we have made substantial progress with 5G, too. Last year, we met our ambition for the majority of the population to have access to a 5G signal by 2027 5 years early through the deployment of basic, non-standalone 5G using existing 4G networks to deliver increased network capacity.

By building world-class, secure digital infrastructure networks, the Government can meet its vision they set out in their Digital Strategy for a competitive and innovative digital economy. This will play a important role in:

- **underpinning other new technologies** - the next decade will see the development and maturation of transformative technologies from AI and self-driving vehicles to digital twins, which will drive demand for advanced wireless connectivity.
- **transforming public services** - there are also significant benefits for improving our public services, supporting smart cities which are cleaner and less congested and

delivering connectivity to our schools and hospitals that will provide better, more interactive lessons and personalised healthcare.

By transforming our economy, widespread adoption of 5G can bring a cumulative productivity benefit of £159 billion by 2035, driving growth and inward investment, and improving lives for communities in every corner of the country.

However, there are challenges we need to address to ensure the UK can realise these benefits, as the economics of investing in wireless networks are changing:

- There is still need to overcome uncertain demand for 5G-enabled services and continuing practical barriers to network deployment need to be overcome.
- Many of the economic benefits we have identified require significantly higher quality connectivity than is likely to be deployed in national public networks.
- 5G roll-out in the near term is likely to focus on urban areas, where the commercial returns are more certain.
- Research we commissioned shows significant variation in the quality of mobile coverage in different parts of the country over the next decade - economically important areas like Freeports and industrial parks could be underserved.

Market dynamics are also changing:

- **Demand is uncertain** as connectivity moves beyond smartphones to enable an array of new, innovative use cases, businesses and the public sector will need to navigate an increasingly complex ecosystem to get the connectivity they require. As many businesses and local authorities do not yet clearly understand the benefits 5G offers or how they can effectively deploy 5G-enabled services to realise these benefits, there is no clear articulation of the demand for higher quality services. In turn, this makes it more challenging for providers to make the business case for investment.

Through this strategy, the UK government set out a new policy framework with 6 key steps to do just that, and ensuring that the UK maximises the potential of advanced wireless networks over the next decade, securing our international competitiveness for the future and driving economic growth across the UK.

1. Ensuring good connectivity for all

As networks are upgraded with 5G technologies over the next decade, 4G will continue to play an important, albeit diminishing, role in providing mobile connectivity across the UK.

Coverage reporting also needs to improve so that it more accurately reflects consumers' actual experience, equipping them with the information they need to choose the right contract. In turn, we expect this to drive further commercial investment to address previously unidentified gaps - ensuring that people and businesses get the connectivity they need, whether to start and grow a business or to have a remote healthcare appointment.

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2. Setting a bold 2030 ambition

Given the substantial potential that 5G offers for businesses and public service delivery, we are setting out a bold vision for the next generation of our national networks to galvanise investment across our economy. We want to move beyond the basic 5G that is being deployed now over 4G networks to build higher quality, standalone 5G networks that do not rely on older infrastructure. We also want to extend 5G coverage well beyond cities and towns to all populated areas of the UK, including rural villages and communities.

We are therefore setting a new headline ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030 *(emphasis added)*.

3. Strengthening the investment climate

While the government already has a range of policies in place to drive forward the deployment of digital infrastructure, our 2030 ambition requires significant commercial investment.

This includes:

- Continuing to remove practical barriers to the deployment of 5G infrastructure.

4. Realising the full benefits of 5G

We want people, business and public services across the UK to realise the full benefits of 5G and advanced wireless connectivity. However, without concerted action, this will be slow to materialise and limited to larger businesses, in fewer sectors, and in certain geographies.

Supporting places to attract investment: we set out how we will drive greater opportunities for industry and public service providers to be empowered customers for future connectivity solutions – supporting places to attract investment and encouraging adoption of 5G services.

We will do this by:

- Driving local leadership and coordination, and encouraging local authorities across the UK to employ digital champions to provide strategic leadership for local authorities' own digital infrastructure strategies

There are 5 chapters which outline the aims and ambitions, along with the steps the government are going to take in order to achieve their set targets and provide improved 5G connectivity for all.

Chapter 1 - Approach and scope

This strategy sets out a policy framework to help deliver the government's priority of growing the economy and to ensure the UK benefits from advances in wireless connectivity for the next decade.

Chapter 2 – Ensuring good connectivity across rural and urban areas

The government's priority to build a better, more secure, more prosperous future for the UK includes a clear commitment to grow the economy, and create better-paid jobs and opportunity right across the country. To do this, it is vital that people who live and work in all parts of the UK, including in rural areas, have access to good quality mobile and broadband coverage.

Chapter 3: Our 2030 ambition

World-class digital infrastructure underpins the digital economy – it was worth £143 billion in 2021, accounting for 5% of the national workforce. This infrastructure provides the backbone of the UK economy and society with ever more jobs, public services and societal interactions built upon its foundations. As growth in the digital sector is nearly six times faster than across the economy as a whole, its importance will only continue to increase as we deliver the Prime Minister's priority of growing the economy.

4G technology revolutionised the way people use their mobile phones. What today is considered normal, a decade ago was ground-breaking. We have seen the growth of streaming services, like Netflix and Spotify, and gained constant access to high quality, user-produced content for free on platforms like YouTube, transformed the way we shop online, travel around cities through access to apps like Uber and Bolt and use public services, such as booking NHS appointments through apps.

The evolution of 5G

While 4G will continue to play an important role in providing widespread geographic connectivity to consumers through public cellular networks across the UK's landmass, 5G can offer significantly better performance and support a far greater range of use cases. 5G enables data transfer speeds of more than 10 times faster than 4G, has the potential to offer lower latency and greater reliability and the ability to connect more devices. The implications of these improvements reach far beyond the potential to develop the capabilities of smartphones, enabling an array of innovative use cases and providing for transformative economic, and social benefits that were perhaps unimaginable a decade ago.

The government's ambition for the majority of the population to have access to a 5G signal by 2027 has been met early through the deployment of basic, or non-stand alone, 5G which is built on a 4G core network. While this has helped MNOs increase the capacity of their networks in more densely populated areas, it does not reflect the full functionality 5G can deliver.

Without clear action, the market for advanced 5G services will remain nascent as many business and public services do not yet fully understand the benefits or how to navigate the supplier ecosystem for 5G enabled digital products, applications and services.

We want high quality coverage to extend well beyond cities and larger towns to all populated areas of the UK, including villages and rural communities. ***We are therefore setting a stretching new ambition of nationwide coverage of standalone 5G to all populated areas of the UK by 2030*** *(emphasis added)*.

Chapter 4: Strengthening the investment environment

Our 2030 ambition requires commercial investment, and this chapter focuses on creating the environment to support it.

The deployment of standalone 5G and ultimately advanced will require operators to deploy additional infrastructure, including:

- 5G core networks in addition to the 5G equipment in the radio access network
- upgrades to the existing grid of approximately 18,000 macro cell sites per MNO
- additional cell sites to provide 'infill' to cover gaps in coverage

Addressing barriers to deployment

Since the publication of the Future Telecoms Infrastructure Review, the government have taken significant strides to make it quicker and easier for operators to roll out new digital infrastructure including making reforms to the planning system to support the deployment of 5G and extend mobile coverage in England.

Chapter 5 – Realising the full benefits of 5G and advanced wireless connectivity

5G and other forms of advanced wireless connectivity pave the way for new services and applications that can have a transformative effect on our public services, businesses and our local economies, delivering this government's priority of growing the economy and creating better paid jobs. Wireless connectivity can support mobile healthcare workers and connected vehicles, improve traffic flow through our cities and enable our factories to be more productive, supporting the fourth industrial revolution. Our evidence is clear that the most significant economic benefits from 5G will come from widespread adoption of advanced 5G by industrial sectors, including manufacturing and logistics, and by public services.

The government is determined that the UK should take full advantage of these opportunities but this will only be possible if places across the country can attract commercial investment in 5G and other forms of advanced wireless connectivity and for that to be adopted at scale by businesses and public services.

Connected places

Improving digital connectivity is one of the government's Levelling Up Missions. We want places and communities across the UK to share in the benefits of good connectivity, enriching lives and driving local growth.

We want to support connected places with their digital connectivity ambitions. **We will do this by helping regions and local authorities to build the case for adopting new technology, attracting investment and removing practical barriers to the deployment of advanced wireless networks** (*emphasis added*). Local and regional authorities play a pivotal role in facilitating the rollout of wireless connectivity and their role will become more critical than ever as investment in 5G continues, due to its technological complexity and the vast number of new applications and services it can support.

Local leadership and coordination

Local leadership can help to identify and break down barriers to deployment at a local level by bringing together stakeholders across the public sector and building strong relationships with industry. The installation of telecoms infrastructure involves a number of different local government departments (such as ***planning***, estates, ***highways***) and their activities can be siloed and uncoordinated.

It is essential that, at a leadership level, local and regional authorities recognise the importance of wireless connectivity and identify decision-makers within the organisation who are empowered to facilitate private sector investment.

Chapter 6: Driving adoption in key economic sectors

Adoption of 5G-enabled use cases in sectors such as healthcare, transport & logistics, manufacturing and agriculture will drive economic growth and productivity across the UK, delivering our priority of economic growth.

Key features of 5G for industry Dedicated 5G networks can enable:

- data analytics: Utilising operational and environmental sensor data to make real time decisions about equipment and operational performance.
- video surveillance and geolocation: Providing the location of workers and assets for security and safety purposes.
- tracking moving assets: Working with self-driving vehicle technology and software guidance systems to provide situational awareness of mobile assets.
- automation: Enabling independently operating robots to perform operational tasks.

Planning Assessment

The main issues arising from this prior approval notification are whether the proposed replacement site, due to its scale and siting, would be a visually obtrusive feature which would be detrimental to the character and appearance of the area, and whether any perceived harm would outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations as outlined in NPPF, the relevant Kirklees Local Plan Strategy and Policies, Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036.

The proposal fully complies with the NPPF and the Kirklees Local Plan Strategy and Policies, the West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan, as the proposal will improve the quality of overall connectivity for the area of Cowcliffe and introduce new 5G provision to the area. Access to a high quality, reliable superfast mobile network is not just 'a nice to have' but an essential part of everyday life. Indeed many, including the former Minister for Digital Infrastructure Matt Warman, consider it to be the fourth utility service as important as gas, water and electricity, a life line for many especially during the COVID-19 pandemic where people were able to see their loved ones, speak to friends and family and arrange virtual meetings allowing some form of normality in a very abnormal situation.

The principle of development has been established by the Government when the new permitted development rights came in to force in April 2022, which enabled sites such as this one to be built under the operators permitted development rights, (as the mast height does not exceed 25m), with prior approval for siting and appearance being the only matters that the local planning authority can take in to consideration.

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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 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 replacement radio base station has been carefully considered. To this end, the proposed site is to be located in an area where the principle of telecommunications development has already been found to be acceptable, and where there are a plethora of existing vertical elements of street furniture in the immediate vicinity, including lighting columns, telegraph poles, floodlighting columns, and an existing telecommunications installation. Consequently, the visual impact of the proposed radio base station will be minimised within the streetscene as the proposed monopole will assimilate well with the existing vertical structures already in situ in the immediate locale.

The proposal, to upgrade an existing site, is in full accordance with national planning policy. The operator has taken a sequential approach and has identified an existing site which can be upgraded rather than seeking to install a new site in the immediate vicinity. Due to the need to retain illumination levels and safety at the bowling club, the scheme also comprises the installation of a new lighting column, to host the existing floodlights and security camera. The lighting column will be the same height and colour as the existing lighting columns around the bowling green. The lighting column will be sited on the same footprint as the existing mast. The proposed replacement mast will be located slightly to the north east of the existing mast, within the existing hedgerow. The hedgerow will partially screen the bottom part of the tower.

The replacement equipment cabinets do not require planning permission, as they can be installed under the operators permitted development rights. In order to remain fully transparent, they have been included on the plans and in the description. The operator's equipment cabinets are similar to those of other statutory undertakers which are common place in urban areas. Their limited height and scale will ensure that these cabinets will not be

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detrimental to the visual amenity of the area. The upgrade will reduce the overall amount of equipment cabinets at the site.

3G and 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 3G, 4G and 5G radio base stations need to be close to their customer demand. The proposal is for the upgrade of an existing site and therefore the replacement column needs to be located as close to the existing as possible, in order to utilise the equipment cabinets and cover the same target coverage area.

The proposed installation is an item of essential infrastructure and therefore will not cause any loss of privacy nor will any occupants of nearby properties be overlooked. The column and antennas do not emit any noise, odour, vibration, artificial light or disturbance from air. The only noise emitted is from a cooling fan within the equipment cabinets, which only operate during hot weather conditions. However, within a few metres the noise is inaudible, particularly when taking into account the ambient noise levels of the area which include passing traffic. The proposed installation will not cause any traffic generation as it is not a visitor destination. Maintenance of the equipment cabinets is usually once a year, where the engineer can walk to site with handheld tools.

Appearance

The design of the monopole has been carefully considered. To this end, it is a simple, functional slim-line monopole, with the main column being split in to two sections. The upper section is 406mm and the lower section is 457mm in width. This column width is essential in order to safely support the antennas at the top of the column and the feeders for all four technologies which are hidden within the main column. The column is proposed to be painted Grey, as it is considered that this is the best colour to blend with the typically grey British skyline and it matches the existing column. However, the monopole can be painted any colour should the Local Planning Authority consider that an alternative colour would be more appropriate.

If the column were to be any lower, the antennas would not be able to clear the surrounding trees and urban clutter as such would not be able to operate effectively. A lower height 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.

In order to reduce the visual impact on the surrounding area the antennas have been positioned in a dual stack formation, with 3 antennas at the top of the mast at an antenna top height of 19.73m and the other 3 antennas are proposed to be located underneath at an antenna top height of 17.33m. The antennas are positioned as tight as possible and will only be marginally wider than the main column width, rather than being a bulky headframe,

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as such will not appear dissimilar to a shrouded design. This is in line with the design aspirations of Policy LP24 of the Kirklees Local Plan Strategy and Policies.

It is essential that the 5G antennas are unshrouded. As the radio frequencies get higher, required for data carrying, the antennas are less able to propagate through immediate blockages including Glass Reinforced Plastic, which is what the shroud is made from. This affects the 5G antennas more so than any other technology. The result being they cannot operate effectively close to Glass Reinforced Plastic or any other blocking material. Therefore there is a technical reason why the 5G antennas need to be unshrouded. The latest 4G technology are also affected more so than older technologies by propagation, and are therefore less efficient if they are shrouded. As such, the other antennas also need to be unshrouded to ensure that the latest technologies are provided to the surrounding area maximising their propagation.

The presence of the linear structures including lighting columns, telegraph poles and floodlighting columns around the bowling green will ensure that the replacement column will not appear incongruous within the streetscene. Thus, there will be no detrimental loss of visual amenity to the area or environmental intrusion in line with the design aspirations of Policy LP24 of the Kirklees Local Plan Strategy and Policies. The characteristics of the site, its wider context and the surrounding area have all been taken into account.

The installation of this replacement 20m slim-line column designed to be as similar as possible to the other linear structures found in the immediate area will be no more at odds with the streetscene and character of the area than the other vertical structures within the immediate locale.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding linear items of street furniture. This 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.

Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The Code of Practice explains this requirement fully in paragraph 39, '*Placing a mast within or adjacent to an existing group of trees, vegetation and other natural features can reduce visual impact… antennas will need to be sufficiently elevated to clear the tree-line…*' It is an essential piece of infrastructure, like pylons and telegraph poles. The proposal should not be considered negatively due to it being taller per se than the other vertical structures including lighting columns in the surrounding area. Reasonable consideration of the proposal in the context of the vertical elements of street furniture in the area can only conclude that the presence of these seeks to provide a setting wherein a base station may appear more congruous from which to provide an important service.

NPPF states at paragraph 115 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. In order to provide the latest 4G technology and 5G service in this locality, and to ensure that the coverage in the area is reliable and does not buffer or drop out, there is a requirement to upgrade the existing site. The operator has already explained above, it is unable to shroud the antennas, but the design is as slim as possible and will represent a simple, functional, vertical structure in the streetscene similar to the existing lighting columns on the street.

If the column and shroud were to be any slimmer, then the multi technologies would not be able to fit in the same installation and an additional radio base station would be required which would be contrary to national planning guidance. It would also not be structurally capable of supporting all the technologies including the latest 4G coverage as well as 5G service provision for VMO2. If the column were to be the same width throughout then it would have to be as wide as the antennas at the top of the column. This would appear more visually prominent in the streetscene than the current proposals.

The proposed RRUs do not require planning permission, as they can be installed under the operators' permitted development rights. In order to remain fully transparent, they have been included on the plans. The limited height and scale (approximately the size of a shoe box) will ensure they will not be detrimental to the visual amenity of the area. In order to maximise signal efficiency, the RRUs need to be as close as possible to the antennas. Given their height above ground level and their small size, they will not appear prominent in the streetscene as they will be out of the general eye-line of casual passers-by.

The design of the radio base station is one of the most sensitive designs available to the operators, designed to resemble typical existing urban linear street furniture. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 115], The Code of Practice as well as the aspirations of Policy LP24 of the Kirklees Local Plan Strategy and Policies.

The proposed replacement column accords with NPPF and Policy LP24 of the Kirklees Local Plan Strategy and Policies, because the equipment will resemble other linear structures within the area and will expand the network, ensure high quality communications infrastructure is maintained whilst minimising the number of radio base stations in the area. Placing masts near similar structures such as lighting columns, utilising simple and unfussy designs is acknowledged in the Code of Practice on Mobile Network Development in England to be less likely to dominate and be in discord with the streetscene and as a result less likely to have a detrimental impact on the visual amenity of the surrounding area.

Lack of Coverage – Material Consideration

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, the mobile phones and other devices we rely on simply won't work. The proposed replacement mast has been sited and designed in order to provide new 3G, 4G and the latest 5G coverage and to improve the existing mobile network.

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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. This is in line with Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036 which highlights their digital priorities relate to skills and business will be delivered, to secure digital infrastructure and to improve digital connectivity. It is acknowledged that almost every aspect of the economy is being transformed by digital technology. The ambition for digital is that Leeds City Region will be recognised as one of the best-connected regions in the country where coverage, choice, and speed of communication stays ahead of demand and where there is an abundance of multi-skilled, digitally mature individuals to cater for every industry's business needs. Enhanced digital connectivity and skills enable people to use digital applications and solutions to improve their lives and to sustain, economic grow, and create new businesses.

Trials have already begun across the UK to demonstrate the potential of 5G and how it can improve and drive productivity and efficiency. In June 2019, West Midlands 5G partnered with BT and University Hospitals Birmingham to trial the UK's first 5G Connected Ambulance. Real-Time communications between the paramedics and the hospital doctors enabled the effective diagnosis of the patient at an early stage of care. The trial showed how a paramedic performed a remote-controlled ultra-sound scan on a patient in an ambulance over a public 5G network. These trials show how digital connectivity and technology can reduce patient waiting times and save lives (Source: WM5G).

In line with the NPPF and Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036, the proposals will provide world-class connections and access to opportunity for all in this cell area, as well as providing world-class digital infrastructure which provides the platform for the Cowcliffe area to embrace emerging technologies and societal changes. 5G infrastructure is fundamental to enable digital technologies to function. The proposals will ensure that any Three 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, smart-region solutions and value-added outcomes will struggle to be brought to fruition.

Without this upgrade to the existing site, the operator's customers would continue to experience an increase in numbers of dropped calls and buffering unable to access the internet on their handheld devices. They would also not be able to access the 5G network, a demand which is increasing rapidly as customers update their handheld devices to ones that are 5G compatible. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the purposes in which they were purchased. This would be contrary to the aspirations of Central Government which aspires to everyone having access to the superfast highway network wherever they are, and that the majority of the population have access to a 5G service by 2027.

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In accordance with the NPPF the proposed upgrade to the existing site will help improve the area's economic prosperity, strengthen the urban economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions. This is in accordance with Policy LP1 and LP4 of the Kirklees Local Plan Strategy and Policies. The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders, reminders to take medicines, make appointments etc. As well as assisting hospital outpatient appointments and emergency consultations carried out remotely via video link, connected ambulances, live streaming of CCTV footage etc. This is also highlighted within the Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036 which expands on the significant economic gains which are possible if the region can deploy the best infrastructure for digital connectivity.

By enhancing the 3G and 4G service provision to the surrounding area and providing new 5G coverage into the operator's network, this would fully support the NPPF and the Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036 which has the ambition for the Leeds City Region to be recognised as one of the best connected regions in the country where coverage, choice, and speed of communication stays ahead of demand and where there is an abundance of multi-skilled, digitally mature individuals to cater for every industry's business needs. Enhanced digital connectivity and skills enable people to use digital applications and solutions to improve their lives and to sustain economic grow and create new businesses. Almost every aspect of the economy is being transformed by digital technology.

The Councilor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

Therefore, the Government fully supports high quality communications infrastructure, even more so with the advent of 5G. The NPPF continues to strongly support telecommunications connectivity and states at paragraph 114 that local planning authorities should support the expansion of electronic communications networks. It acknowledges that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.

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 upgrade to the existing installation in this location will fill the current gap in the latest high quality service provision and enable the operator and MVNOs who buy network space off this operator to maintain access to their handheld devices wherever they are for

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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.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and an upgraded radio base station in this location providing the latest 3G, 4G and 5G technologies will support the NPPF.

In line with guidance contained within the NPPF an upgraded radio base station in this location will enable fast, reliable, secure internet accessibility wherever the user is located. This would fully meet the latest operators' coverage and capacity requirements for 3G, 4G and new 5G provision. This would be wholly in line with the Government's latest aspirations to strongly support advanced, high quality and reliable communications infrastructure, essential for economic growth and social well-being.

As part of the operators 4G licence obligations, many customers will benefit significantly from a vastly improved service provision in this locality. They will be able to gain access to the very latest technologies and connectivity, including 5G, to high-speed data services. Digital technology has catalysed the interconnection of the global economy, with the internet enabling the free exchange of goods and services, providing consumers with greater choice and businesses with access to skills, resources and customers. The Code of Practice acknowledges that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which we rely. With increasing consumer demand and the Government's aspirations for high quality communications infrastructure it is ever more important to improve connectivity and capacity.

In the Code of Practice, it emphasises the need for Local Planning Authorities to take account of network deployment and siting and design, when considering proposals. In relation to the introduction of 5G network deployment the Code acknowledges the requirement of additional equipment to provide necessary coverage and capacity. With the increasing consumer demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity. This is due to the ever-increasing demand for data hungry applications to be available to a range of connected devices, such as smartphones and tablet computers. However, the Code notes that upgrading and improving mobile networks will not be possible without the necessary infrastructure on which they rely.

The operator not only has a license requirement to provide a certain level of 3G/4G coverage to the population the operators are obliged to meet the growing consumer demand for 5G coverage, but especially as more people are also purchasing 5G enabled devices, in line with their license obligations and the operators competitive market driven "requirement" to provide a high-quality service. Customers expect to be able to access their portable hand-held devices wherever they are, whether that be indoors or outside. There is currently no 5G coverage in this area for the operator and this upgrade to their existing site will allow for customers in the area to access this technology.

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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 wherever they are, for whatever reason, for the purposes in which they were purchased.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does LP1 of the Kirklees Local Plan Strategy and Policies, Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036. Mobile communication plays a significant role in sustainable development, being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and Policy LP1 of the Kirklees Local Plan Strategy and Policies, Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036, to minimise the effects of climate change, reducing the need to travel, and therefore the carbon footprint.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Ensuring that the 2G, 3G and 4G coverage and capacity in this area is maintained and enhanced, and providing new 5G services, and continuing to transform the digital connectivity of the city to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027, 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). 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.

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

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to be resilient and competitive. It will help the Leeds City Region be a world-leading digital region and one which 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.

The enclosed Cornerstone Local Authority Engagement Brochure September 2020, emphasises further the benefits of high quality mobile connectivity including: promoting economic growth by attracting investment from business, which creates jobs and regional prosperity in line with national and local economic strategies; helps local businesses to offer a broader range of services, boosting the local economy; helps local Councils to offer online services such as school admissions and local information for residents supports local companies by facilitating working from home, offers social benefits such as being able to connect with vulnerable family and friends (a life line during COVID 19 lockdown) or contact the emergency services 24/7, and helps local councils to offer online services such as paying council tax bills which provides a more efficient service to name but a few benefits.

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 private. For instance, trials have shown

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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.

There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

Paragraph 38 of the revised NPPF 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 conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'*.

Upgrading and enhancing the existing 2G, 3G and 4G coverage and capacity, and providing new 5G service provision, for VMO2 in this area will fully meet paragraph 38 of the NPPF.

The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with the upgrade to the existing radio base station in this location. HM Treasury outlined such benefits in its report '*Fixing the Foundations: Creating a More Prosperous Nation*' – July 2015. Paragraph 7.1 of the plan stated that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes on to highlight strong support for high quality communications infrastructure. It states

> *'by reducing red tape and barriers to investment, the Government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The Government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published March, of near universal 4G and ultrafast broadband coverage.'*

Indeed, MPs have noted in parliament that the UKs Superfast Broadband connectivity was 'relatively poor' and businesses were losing out from patchy coverage.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical

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coverage further across the UK, with continuous mobile connectivity provided to all major roads and to being a world leader in 5G.

This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver property at the local level and enable all places to share in the proceeds of growth.

The Government is determined to ensure the UK receives the coverage and connectivity it needs. To this end, the Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from the investments in the new technology. The proposed replacement installation will fully support these national aspirations.

The case for 5G is compelling as it will bring faster, more responsive and reliable connections than ever before. More than any previous generation of mobile networks, 5G has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, creating the so-called "Internet of Things". This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for business and farmers, all through the real-time management of data.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
    - Transport and logistics: connected parcels and fleet tracking.
    - Health and social care.
    - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
    - Smart agriculture and smart animal farming, smart retailing.
    - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016 (https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx). It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

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> *'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'*

The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining and enhancing high quality 2G, 3G and 4G coverage and capacity for VMO2 in Cowcliffe, as well as providing 5G in this area, where the social and economic benefits will outweigh the environmental considerations.

The Government's continued strong support for connectivity is further evidenced by the DCMS who launched their UK wide Digital Connectivity Portal on 20 December 2018. The Digital connectivity portal provides guidance for local authorities and network providers on improving connectivity in local areas. The Government wants everyone in the UK to benefit from world-class connectivity no matter where they live, work or travel. The Future Telecommunications Infrastructure Review outlines a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses. As a result, the pressure to upgrade the existing site in this area to enhance 2G, 3G and 4G service, and introduce new 5G coverage, for VMO2 is significant.

On the 23 September 2020, the former Digital Infrastructure Minister Matt Warman MP spoke about the ongoing work by the Government and telecoms industry to boost the UK's world class digital connectivity in his keynote speech at Connected Britain 2020[2]:

> *…'I'd like to take this opportunity to thank everyone in the industry for their tireless efforts at keeping us all connected through an unprecedented period of disruption.*
>
> *…COVID has altered the way we live, work and most importantly, stay connected with our family and friends. The digital infrastructure that keeps us all connected was essential to our daily way of life under lockdown – and is now more important than ever as we head into recovery. Many of these changes – such as increased working from home – will stay with us for the foreseeable future.*

[2] https://www.gov.uk/government/speeches/matt-warmans-keynote-speech-at-connected-britain-2020?utm_source=01ad07cc-6884-4d9b-a0ca-8c212f0a4289&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

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People have referred to the internet as "the fourth utility" – and it's true. For countless people across the country, having fast and reliable broadband and a good mobile connection is as essential and vital to our daily lives as gas, water and electricity.

That's why I'm committed to working with you to ensure the entire nation has access to world-class, next generation gigabit connectivity that is secure and resilient enough to deal with all sorts of future challenges.

This Government is ambitious for the UK's digital infrastructure.

And because we know that more citizens are increasingly living their lives online, we will be one of the earliest adopters of 5G coverage, with the majority of the population able to access 5G by 2027.

...We know how important local authorities are to the delivery of digital infrastructure, which is why I have written to them, together with the Local Government Minister, to outline how they can work more effectively with the industry…

….Turning to 5G, while the commercial rollout of 5G continues at pace, we're pushing ahead with plans to make sure all sorts of industries benefit from this game-changing technology.

….since the start of the 5G Testbeds and trials programme, we've now funded 24 5G testbeds across the UK. Between them, those testbeds have trialled almost 70 different 5G technologies, products and applications. And more importantly than ever, we are investing in a range of sectors to foster, build and grow 5G cross wider industry...

…The world is in the middle of a digital revolution. COVID has accelerated this process, digitising almost every part of our everyday lives and making the infrastructure that connects us more important than ever. That's why it is at the top of the government's agenda…"

In a more recent letter published by the former Digital Infrastructure Minister Matt Warman MP on the 24 May 2021 he spoke further about the Government's Commitment to extending mobile coverage:

'Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity…

…The Government is committed to extending mobile network coverage across the UK and providing uninterrupted mobile signal on all major roads, and our ambition is for the majority of the population to have access to a 5G signal by 2027…

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…The National Planning Policy Framework ("the Framework") for England states that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology, such as 5G…

…In relation to electronic communications development, it also states that local planning authorities must determine applications on planning grounds only and they should not seek to prevent competition between different operators or question the need for an electronic communications system. As set out in planning practice guidance, it is in the public interest for local planning authorities to have effective delegation arrangements in place to ensure that decisions on planning applications that raise no significant planning issues are made quickly and that resources are appropriately concentrated on the applications of greatest significance to the local area'.

On the 1 October 2020, as part of the Speed up Britain Campaign, The Centre of Policy Studies Report published '*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*'[3]. The report identifies what the 5G opportunities are and what the Government needs to do so we can all benefit from this vital new technology. It states that delays to the rollout of 5G could cost the country tens of billions of pounds in lost economic output. The former Government advisers Alex Jackman and Nick King argue that Government's 'levelling up' agenda and the UK's recovery from the COVID-19 pandemic is at risk without a faster 5G rollout – to the tune of £41 billion.

The report highlights that if delays continue at their current rate, by 2027, over 11 million households and businesses could be missing out on vital digital connectivity. Improving digital infrastructure supports the Government's 'levelling up' agenda, by helping local areas to retain and attract businesses and talent as well as by reducing regional inequalities.

The report states that '*the UK must have a functioning network to now support the recovery from the pandemic, empowering businesses and communities with wider coverage, and preparing the ground for the services that 5G can provide'.*

Using analysis by the independent consultancy Policy Points, the report estimates that if 5G coverage reaches a quarter more of the population than the Government's current target of 51%, it will produce GDP gains of £41.7 billion by 2027. It highlights that the difference between the UK being a leader and a laggard in 5G adoption could be as much as £173 billion in incremental GDP over the coming decade, as estimated by the Future Communications Challenge Group.

The manufacturing, construction and agricultural sectors have been hit particularly hard by the pandemic, and these would benefit significantly from improved connectivity. However, onerous planning rules and loopholes in existing legislation are slowing down the infrastructure upgrades needed to make the most of this mobile revolution in these much-needed industries.

[3] https://www.cps.org.uk/research/upwardly-mobile

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Digital networks and services have underpinned our resilience to the COVID-19 pandemic and they will drive our recovery. By expanding them, we deliver not only immediate benefits but also the essential foundation stone for future prosperity.

The report highlights that while 5G promises to create economic benefits through increased capacity, reliability and speed – vastly improving business productivity and removing barriers imposed by poor digital connectivity – the system is plagued by red tape.

The report acknowledges that the gains are not just at national level. A more extensive digital infrastructure helps local areas to attract and retain businesses and talent, thereby playing a vital role in reducing regional inequalities. Providing a supportive environment for digital infrastructure is one of the few things the Government can do that costs little, boosts growth and helps level up the UK…. the key is speed. **The faster a network is built, the bigger the regional gains** (emphasis added). The telecommunications industry faces challenges on this front. The COVID-19 pandemic has increased demand on networks but delayed the availability of new spectrum to provide additional capacity.

The report notes that the reliability and reach of 4G is more important than ever. It is needed both to quench immediate demand, and also to facilitate future 5G rollout, as the underlying passive infrastructure will initially support both technologies. Every failure to provide better coverage not only presents an immediate opportunity loss for local business and consumers but also has a bigger downstream economic impact. It acknowledges that productivity gains to business, equality gains for regions and economic gains for the country are only as achievable as the networks they can access.

The report recommended that the Government should reform the strategic planning framework to compel local authorities to ensure that the needs of future mobile connectivity are adequately addressed in Local Plans and that new developments are assessed on how they might impact, or could support, local connectivity.

In the recent Levelling Up and Regeneration Bill[4], which set out "12 bold, national missions" which will be given legal status, Mission 4 is:

"By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for most of the population".

It highlights the important benefits that high quality, reliable connectivity can provide, particularly in rural areas. It states:

"The COVID-19 pandemic demonstrated the importance of digital infrastructure right across society, from ensuring business continuity to reducing isolation. Improved digital connectivity has the potential to drive growth and productivity across the UK and widen job opportunities through remote working. However, there are significant spatial disparities in the quality of

[4] https://www.gov.uk/government/publications/levelling-up-the-united-kingdom

broadband and mobile networks, with rural areas likely to experience worse digital connectivity than urban areas."

The proposed installation in this location will allow the operator to provide enhanced high quality 2G, 3G and 4G coverage and capacity and new 5G service provision supporting the Government's aim of 'focusing on ensuring that everyone is connected to the information superhighway'.

An upgrade to the existing installation in this location will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area. This is in full accordance with the operator's 4G license obligations and the West Yorkshire Combined Authority's aims and aspirations to expand and improve telecommunications mobile coverage as required and to have the latest high quality 5G infrastructure, promoting and growing the digital sector and increasing digital inclusion.

Summary

The proposal is for the upgrade of an existing telecommunications site, which is fully in line with national planning policy and guidance for the operators to take a sequential approach and upgrade existing sites first before seeking new installations.

The proposed height at 20m is essential in order for the antennas to clear the surrounding urban clutter and trees, and ensure the antennas are able to reach the target coverage area, to provide enhanced high quality 2G, 3G and 4G, and new 5G service provision to Cowcliffe. This will fully meet the national Government's 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, the relevant relevant objectives and policies within the Kirklees Local Plan Strategy and Policies, Kirklees Economic Strategy 2019-2025, West Yorkshire Combined Authority – Leeds City Region Digital Framework, and the West Yorkshire Combined Authority – Leeds City Region Strategic Economic Plan 2016-2036. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.

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Position:	Town Planner	(On behalf of Cornerstone)	

In the first instance, all correspondence should be directed to the agent.

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