SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Kirke House	Site Address:	Kirke House, Church Street, Paddock, Huddersfield, West Yorkshire, HD14UD.
National Grid Reference:	E 412900 N 416320		
Site Ref Number:	CTIL_11292528	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: Upgrade of existing site.		
Were industry site databases checked for suitable sites by the operator:		No
If no explain why: Upgrade of existing site.		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	05/04/2023
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 a copy of the proposal plans were sent to the Chief Planning Officer on 03/04/2023. Response received from Development Management Deputy Team Leader: "I note the proposal would increase the amount of infrastructure which is installed to the building, which is a grade II listed building (EH Ref: 134328) and would raise concern about the impact it would have upon a heritage asset, although note there would be some level of public benefit resulting from the development proposal, it is not clear to what degree this would be over and above that which exists already as a result of the current installation. In the absence of identified alternative sites it is difficult to provide a fuller / firmer opinion about the proposal. I note there is a more industrial area to the east of the site which may be better suited to the installation of telecommunications equipment than a grade II listed church and would recommend consideration is given to less sensitive sites such as this." No further comments received to date.

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 Vodafone 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 Vodafone'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 our 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

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Rating of Site under Traffic Light Model:	~~Red~~	Amber	~~Green~~
Outline of consultation carried out: Pre-consultation letters and a set of plans have been sent to the local ward councillors for Greenhead ward and local MP by email on 03/04/2023.			
Summary of outcome/main issues raised (include copies of relevant correspondence): Response received from Cllr Ullah on 03/04/2023 in acknowledgement of the proposal. No other specific comments received to date.			

School/College

Location of site in relation to school/college (include name of school/college): Paddock Junior, Infant and Nursery School. Heaton Rd, Huddersfield HD1 4JJ.
Outline of consultation carried out with school/college (include evidence of consultation): Pre-application consultation letter and a set of plans were sent to the Headteacher and Chair of Governors on 03/04/2023.
Summary of outcome/main issues raised (include copies of main correspondence): No specific comments received to date.

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: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?		No

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Date served:	This is a full planning and listed building consent application. Notice has been served to the office manager of the building via special delivery on 07/06/2023. Notice and proof of delivery are attached as part of this application.

3. Proposed Development

The proposed site:
Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to: • promote shared infrastructure • maximise opportunities to consolidate the number of base stations • significantly reduce the environmental impact of network development As part of Cornerstone and VMO2's network improvement programme, VMO2 are in the process of upgrading a number of their existing sites in order to provide improved 2G, 3G and 4G coverage and capacity, and new 5G service provision. This is fully in line with the Government's aim to ensure that everyone is connected to the superhighway. As part of VMO2's continued network improvement program, there is a specific requirement to upgrade the existing installation at Kirke House, to provide improved 2G, 3G, 4G and new 5G coverage and capacity, ensuring that this area of Paddock has access to the latest technologies.    Image 1: Existing Site

The site is an established radio base station comprising 3 no. antennas mounted on ~~new~~ support poles, on existing wall-mount brackets, on the outside of the Church tower and an equipment cabin and power cabinet at ground level.

The surrounding area is a mixture of residential and commercial properties, with the land north of Church Street and bound by the railway line extending east and west. The existing site has been in situ and an established part of the network for the operator in this area for a number of years. The proposal is for the upgrade of this existing site.

The replacement antennas will be face-mounted and coloured to match the existing equipment on the church tower. Visually they will be very similar to the existing equipment. They will be fixed to new support poles which will be mounted on the existing brackets, ensuring that no new drilling or fixings are required on the fabric of the listed building. The proposed replacement RRUs will be rail-mounted to the inside of the clock tower, similar to the existing equipment.

The church is a Grade II listed building. No new drilling to the listed building is required.

Enclose map showing the cell centre and adjoining cells if appropriate:
The replacement antennas and ancillary development will ensure that the latest 2G, 3G and 4G technology will be able to be provided from this existing established radio base station, with minimal amendments to the visual amenity of the area. This includes the superfast 2100MHz frequency required for the most advanced 4G spectrum available to the operators adding additional capacity into the operators' networks for data provision to meet the growing demand on the network as more people access data from their hand-held devices in order to go about their daily lives. The upgraded site will also provide 5G technology to the area. This will ensure high quality customer experience is maintained as demands on the network increase and technologies change.

Type of Structure *(e.g. tower, mast, etc): Face-mounted antennas on building*	
Description: The removal of 3 No. antennas and 18 No. RRUs from within the clock tower. Installation of 6 No. replacement antennas on existing antenna support poles and the installation of 15 No. replacement RRUs within the existing clocktower. All other works within the existing equipment cabin.	
Overall Height: 20.8m to top of highest antenna	
Height of existing building *(where applicable):*	Approx. 25 Metres
Equipment Housing: Located internally within equipment cabin	
Length:	N/A
Width:	N/A
Height:	N/A

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

Reasons for choice of design, making reference to pre-application responses:
The existing radio base station has been in situ in this location for a number of years and has become an established feature in the streetscene. Technology advances (including 5G service provision) and additional demands on the operator's mobile network system in the area have meant that replacement upgraded antennas need to be installed to facilitate all the data that is required to be carried for mobile superfast broadband. This enables customers to continue to be able to use their handheld devices for the purposes in which they have become accustomed, and now rely on in the modern world we live in, a similar scenario to the reliance on gas and electricity. However, these new technologies for the latest 4G and 5G service provision and the design of the antennas required for them means that the existing antennas must be replaced with upgraded antennas and new transmission dishes must be installed in order to be technically feasible, link into the network and deliver adequate levels of coverage to the target area. The operator has carefully considered the siting and design of the upgraded equipment. It is proposed to upgrade an existing telecommunications site, which utilises an existing building. This is in full accordance with NPPF and Code of Practice guidance in that a sequential approach should be taken and existing sites should be upgraded first wherever possible, before seeking to install new sites. 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 (enhanced 2G, 3G and 4G, and new 5G coverage), replacement antennas and RRUs are required. RRUs are small, each about the size of a shoe box, and will allow the antennas to operate all of the different technologies. The replacement antennas will be coloured to match the existing equipment and will therefore blend with the clock tower. The RRUs will be located internally within the clock tower and will therefore not be visible from public vantage points. The replacement antennas and RRUs will allow the site to provide the necessary high-quality communications coverage which is required for everyday access to high-speed data in this area of Paddock, which users of their handheld devices have come to expect in this 21st Century technological age. Great care has been taken to ensure that the proposed replacement antennas and equipment can be fixed to existing support poles, to avoid any drilling or fixing of new support structures to the Grade II listed clock tower. The only new structures required are the wall-mounted support poles which support the antennas, due to the existing 3 no. antennas being replaced by 6 no. antennas. These will be fitted on existing wall brackets which are already fixed to the brickwork. It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed design represents the best compromise between the visual impact of the proposal on the surrounding area and

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meeting the multi technical requirements for the site. Taking all matters into account, it is considered that the upgrade of the existing telecommunications site at Kirke House clock tower, to enable the enhancement of 2G, 3G and 4G service provision and new 5G coverage to the surrounding area, would not appear out of place within its surroundings and would provide enhanced high quality, reliable and secure coverage and capacity, delivering the capability for a multi hi-tech service and utilising an existing building.

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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 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 enable enhanced 2G, 3G and 4G coverage and capacity and new 5G coverage for VMO2, to the area of Paddock, Huddersfield. This ensures customers are able to continue to use their handheld devices for the purposes in which they have become accustomed, whilst on the move, as demands on the system for greater capacity augment as more customers access the data on the operator's network.

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 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)

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. Due to the technical requirements, to provide enhanced 2G, 3G and 4G coverage and new 5G coverage to the area for VMO2, upgraded antennas are required. The upgraded antennas will be located on new support poles on existing brackets on the clock tower and replacement RRUs will be located on existing support poles internally within the tower.

Land use planning designations:

N/A

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.

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

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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

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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'.

The NPPF provides guidance on proposals affecting heritage assets in Section 16. Paragraph 194 states that *"in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."*

Paragraph 195 goes on to state that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset).

The NPPF goes on to provide guidance on considering the potential impacts of development on heritage assets. Paragraph 199 states that when considering the impact of a proposed

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development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 202 retains advice provided in the 2012 version of NPPF relating to the degree of harm. It states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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

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 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

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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 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*

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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 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)".*

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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 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;*

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- *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 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*

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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:

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

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%

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- 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 an 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 a 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.

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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.

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

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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

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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.

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. The site is identified as being located on white land. There are no specific policies within the Local Plan which relate solely to telecommunications development, but there are numerous policies relating

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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.'

Policy LP35

'Historic environment'

'Development proposals affecting a designated heritage asset (or an archaeological site of the national importance) should preserve or enhance the significance of the asset. In cases likely to result in substantial harm or loss, development will only be permitted where it can be demonstrated that the proposal would bring substantial public benefits that clearly outweigh the harm.'

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 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

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- 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 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:

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'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.

We will work with industry to explore the opportunities to use alternative technologies that improve digital infrastructure across the City Region, and alongside this, work through the LEP Growth Service to support business awareness and take-up of the opportunities that are presented by enhanced digital connectivity (see Priority 1 for detail).'

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.

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.

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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 adults 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

The table below 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.

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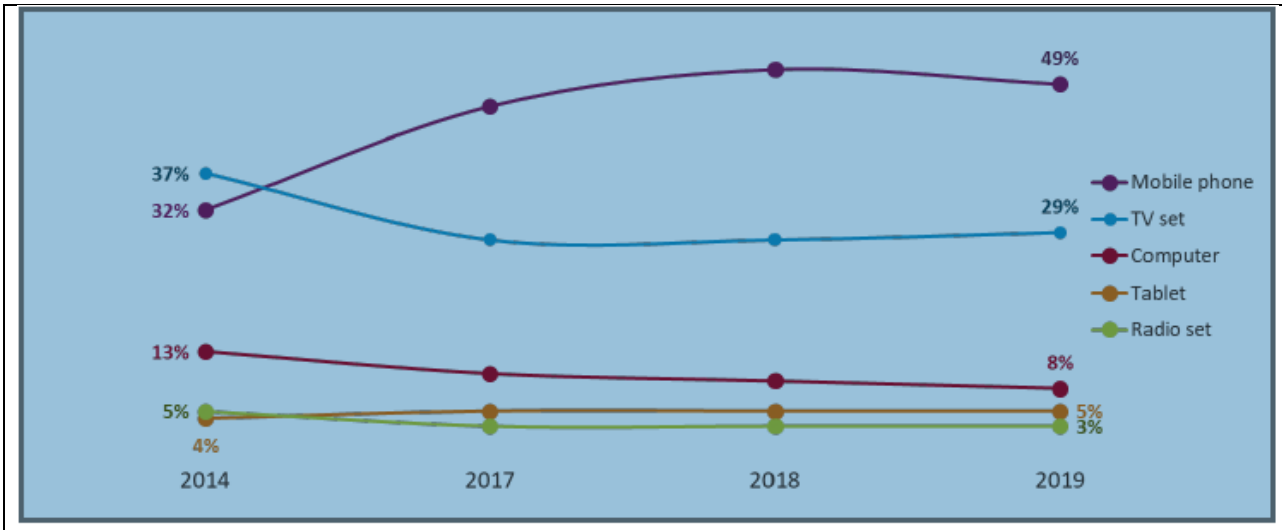

Planning Assessment

The main issues arising from this application for full planning permission and listed building consent are whether the proposal would be detrimental to the character and appearance of the area and listed building, 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 the NPPF, which fully supports the roll out of 5G and the next generation connectivity to accelerate business opportunities and growth to ensure the economy is resilient and competitive, and also the relevant objectives and policies within the Kirklees Local Plan, Kirklees Economic Strategy, Leeds City Region Digital Framework and Leeds City Region Strategic Economic Plan (SEP).

The proposed upgrade fully complies with the NPPF, the Kirklees Local Plan, and Leeds City Region Digital Strategy as it will improve capacity and provide new 5G services to this area of Paddock. 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 proposal is for the upgrade of the existing telecommunications site located at Kirke House clock tower. The principle of telecommunications development in this location has already been accepted by the Local Planning Authority. The upgrade of an existing site is wholly in line with national planning policy guidance on taking a sequential approach and seeking to upgrade existing sites first. The clock tower currently hosts equipment for this operator, which is fully in line with NPPF and Code of Practice in relation to site sharing.

Government guidance states that in order to limit visual intrusion, the number of radio and telecommunication masts and the 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. Use of existing masts, buildings and other structures for new electronic communications capability should be encouraged. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate. The proposal fully complies with this Government guidance. The existing site will be upgraded, allowing VMO2 to provide enhanced capacity and new 5G services to the area. This is in line with the guidance in the NPPF and Code of Practice, as well as the aims to improve connectivity as outlined in the Leeds City Region SEP and the Digital Framework.

The proposed upgrade to the existing radio base station will enhance VMO2's customer experience by providing improved 2G, 3G and 4G coverage and capacity as well as new 5G services to the surrounding area of Paddock. It will enable the operators' customers to continue to utilise their handheld devices for the purposes in which they have become accustomed, as well as being able to access the latest technology wherever they are whether that be indoors or outside. The design promotes site sharing and minimises the need for a new installation in the area. It offers the best environmental solution, limiting the number of new sites required, limiting the visual intrusion in the area. This is in full accordance with NPPF and the Code of Practice, as well as Policy LP24 of the Kirklees Local Plan, and the aims of the Leeds City Region SEP and Digital Framework which supports the development of digital connectivity in the region in order to support local residents and businesses.

The design of the apparatus has been carefully considered. To this end, the scheme proposes 6 no. replacement upgraded antennas, on new upgraded support poles fixed to existing wall brackets, and 15 no. replacement RRUs within the clock tower. The proposed equipment will be coloured to match the existing. It will remain face-mounted on the clock tower and will therefore be viewed in the context of the clock tower itself and the existing equipment around it.

Utilising the existing wall brackets ensures that there is no requirement for drilling into the listed clock tower, which is in full accordance with policies LP24 and LP35 of the Kirklees Local Plan, which aims to preserve listed buildings and avoid harm. Further to this, the upgraded antennas are designed to look similar to the existing antennas which they will replace.

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. It accepts that new sites might be required for 5G networks (para 115). In this case it is possible to utilise an existing site and upgrade the equipment at it, rather than installing a new site in the nearby vicinity. Therefore, the proposed installation accords with the Kirklees Local Plan policies aforementioned.

The design of the radio base station is one of the most sensitive designs available to the operator, which will upgrade an existing site which utilises an existing building. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed and camouflaged where appropriate [paragraph 113], The Code of Practice as well as the

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aspirations of policies LP1, LP24 and LP35 of the Kirklees Local Plan. Any perceived harm to the heritage asset in this instance would be significantly outweighed by the benefits of the proposal, as it will provide enhanced capacity and new 5G coverage for VMO2 to the local area, in line with NPPF.

Heritage

Kirke House (and clock tower) is a Grade II Listed Building (ref: 1134328), first listed on 29th September 1978 as *Church Street Longwood Church of All Saints.* The clock tower was constructed in 1828 comprised of sandstone. The church was declared redundant in 1984, with all furnishings and fixtures removed and the chancel converted into 1 no. residential dwelling.

Given the local importance of the clock tower and its unique appearance within an otherwise predominantly residential area, it is considered a heritage asset of reasonable to high significance.

The proposal will have a limited visual impact on the listed building, particularly in long views from public vantage points, due to the visual similarity of the replacement antennas and the utilisation of existing wall-brackets. There is a requirement to install replacement support poles, this is due to the existing support poles being unable to support the 3 no. additional antennas. The new support poles will appear similar to the existing support poles. The visual impact will also be minimised as the proposed replacement antennas will be painted to match the existing telecommunications equipment, which assimilates with the clock tower itself. The RRUs will be located internally and fixed to existing rails; thus they will not be visible from public vantage points.

The utilisation of new support poles attached to existing wall brackets ensures that there is no requirement for drilling or fixing any new supporting structures to the tower, thus conserving the material of the listed building so far as practicable.

As such, it is considered that the proposal will cause less than substantial harm to the significance of the heritage asset, and that the works are at the lowest end of the less than substantial spectrum.

Where less than substantial harm is identified, the NPPF states that "*this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*". This is also in accordance with LP35 of the Kirklees Local Plan.

The public benefits of the proposal are very significant, and as such, it is considered that the benefits of the proposal would outweigh the less than substantial harm in this case. Further details of the extensive public benefits provided by the proposal can be found below.

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Lack of Coverage – Material Consideration

In accordance with the NPPF and the key objective to improve digital connectivity as outlined in the Leeds City Region SEP, the proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Paddock continues to get the mobile coverage it needs for VMO2 customers as well as new 5G coverage. It will also maintain and improve coverage for the Mobile Virtual Network Operator's (MVNOs) which use the VMO2 network which includes GiffGaff, Tesco Mobile, Sky Mobile and Lyca Mobile. So the proposal will not only provide a service for the main operator, but also those who buy network space off them, which is at least 4 with VMO2. This will provide a choice for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained within the NPPF which supports infrastructure especially where growth takes place. By providing the latest 4G technology and new 5G service provision the proposals will also help meet the aspirations of the Leeds City Region Economic Strategy, SEP and Digital Framework. *Action Programme* 9 of the Economic Strategy in particular highlights the importance of high-speed, reliable internet access for the region, particularly in relation to active travel. The programme outlines the need for planning for such necessary infrastructure in advance of demand and that the provision and expansion of digital infrastructure should be at the heart of planning applications.

The proposed replacement apparatus will also fully comply with the NPPF. There is an identified need for the upgrade to the existing site in order to provide the latest 5G technology to this area of Paddock, ensuring there is sufficient capacity in the network to prevent buffering as greater demands on the network lead to additional pressure on capacity. If there is insufficient capacity then even if coverage is available customers would increasingly be unable to utilise their handheld devices for the manner in which they have become accustomed. Ensuring that the 2G, 3G and 4G coverage is sufficiently enhanced and providing new 5G coverage to the area is fully in line with the requirements of NPPF which recognises the importance of providing 21st Century Infrastructure to support an increasing population.

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).

Without the upgrade to the existing site, the operator's customers would not be able to access the 5G network, a demand which is increasing rapidly as customers update their

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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.

The proposed amendments to the existing installation will help improve the area's economic prosperity, and strengthen the urban economy 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, a key ambition of the Kirklees Local Plan and Leeds City Region Economic Strategy. 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. This further aligns with the Leeds City Region Digital Framework ambition to reduce the 'digital gap' and provide equal access to digital opportunities.

By enhancing the 2G, 3G and 4G service provision to the surrounding area and providing new 5G coverage into the operator's network, this would fully support the Leeds City Region SEP, Economic Strategy and Digital Framework.

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 streetlights, water meters and bus stops. As such these areas need the 21st century infrastructure to enable this to become a reality. An upgraded installation in this location enabling 5G service provision to the Paddock area will help ensure that Kirklees can utilise the benefits of the Smart City agenda.

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 Councillor'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.

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.

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The proposed upgrade of the existing site will fill the current gap in the latest high quality 5G service provision and enable VMO2, and MVNOs who buy network space off them, to maintain access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Central and Regional Government's aspirations that everyone has access to the superfast communications network, contained within the NPPF, and also the Mobile Wireless Infrastructure Strategy 2023.

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 2G, 3G, 4G and 5G technologies will support the Central and Local Government objectives to improve connectivity infrastructure to speed up economic and business growth.

The proposed upgrade of the existing installation in this location 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, where the NPPF notes that decisions should support the expansion of electronic communications networks.

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.

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.

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 the authority's Local Plan, particularly policy SP1. 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

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to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with NPPF and the Kirklees Local Plan vision, 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 and Policy SP1 of the Kirklees Local Plan supports development that improves the economic, social and environmental conditions in the area. Enhancing the 2G, 3G and 4G coverage and capacity in this area and providing new 5G services will fully meet this national and local policy objective. Continuing to transform the digital connectivity of the area to drive economic growth and innovation, working to meet national targets of full roll-out of 5G technology for most people by 2027, will ensure economic growth and social well-being, as per policies LP1 and LP4 of the Kirklees Local Plan.

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. This is in full accordance with Leeds City Region's SEP, Digital Framework and Economic Strategy which aim to close the digital divide across the region and identifies improving 5G digital connectivity as part of its guiding principles.

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 will help this area of Paddock comply with the aims and objectives of the Economic Strategy, Digital Framework and SEP.

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

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

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

Providing enhanced 3G and 4G coverage and capacity and new 5G service provision in this area will fully meet paragraph 38 of the NPPF, to develop the best in class digital infrastructure to underpin the efficient functioning and growth of the regional economy, and identify opportunities to improve and accelerate the roll out of fibre, 4G and 5G technologies to accelerate business opportunities and growth to gain regional competitive advantage.

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 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 upgrade 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:

> *'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 in Paddock, as well as providing 5G for VMO2 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 provide enhanced 2G, 3G, 4G and new 5G service 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.*
>
> *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.*

[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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….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…

…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.

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

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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.

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

The proposed upgrade of the existing installation in this location will allow the operator to provide 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'. This fully meets the aspirations of the NPPF, the guidance for the relevant policies within the Kirklees Local Plan and the Leeds City Region Economic Strategy, Digital Framework and SEP.

The proposed upgrade 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 Council'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

This is an upgrade to an existing established radio base station in this location. It is not possible to utilise the existing antennas and provide the latest 4G and 5G communication

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

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technologies. Therefore, replacement upgraded antennas are needed to provide the latest, high capacity 2G, 3G and 4G coverage and new 5G ability for VMO2.

The upgraded site is located on an existing building, where the presence of telecommunications equipment is already established. The upgraded antennas and RRUs are required to ensure that the site is technically feasible, capable of delivering the required capacity and new 5G coverage to the target coverage area. On balance, the amendments to the radio base station will not have a detrimental impact on the visual amenity of the surrounding streetscene. The amendments will provide enhanced 2G, 3G and 4G coverage and capacity to the surrounding area and new 5G coverage. Thus providing a high-quality service to its customers and access to the latest technologies whenever and wherever they are.

Any limited harm will be outweighed by the benefits associated with providing and maintaining the latest high quality communications in line with NPPF and the Government's strong commitment to a world leader in 5G. If the challenge is to be met to provide pervasive, affordable, resilient digital connectivity, the challenge is early roll out of 5G especially in areas where mobile data use is congested such as in this location where new residential properties have been constructed.

Site selection was progressed in accordance with the applicant's licence obligations, advice in the NPPF and the Code of Practice and represents the least environmentally intrusive, technically suitable, available option. In this case it was possible to upgrade an existing site, utilising an existing building, which fully complies with the sequential approach.

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 Kirklees Local Plan, the Leeds City Region Economic Strategy, Digital Framework and SEP. Great care has been taken to ensure that the proposal utilises existing support poles and to visually match the existing equipment, in order to minimise harm to the Grade II clock tower. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

Confirmation that submitted drawings have been checked for accuracy

Redacted

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