

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	CU PHOSCO CAR PARK	Site Address:	35 WESTGATE, CLECKHEATON, KIRKLEES, BD19 5LE
National Grid Reference:	418682E, 425160N		
Site Ref Number:	30635200	Site Type: ¹	MACRO

Site Background information:

As part of VMO2's (trading as O2) continued network improvement program, there is a specific technical requirement to provide new 5G coverage in this area of Kirklees.

There is an existing shared rooftop site in proximity which currently serves the area for both VMO2 and Vodafone. The existing site cannot be upgraded to accommodate the needs of both operators due to technical constraints and as such a replacement installation is needed to serve one of the operators, in this case VMO2, to meet this requirement.

In order to fit into the operator's single grid network, a replacement site is needed in close proximity of the existing to replicate and improve upon the existing coverage pattern.

This application seeks consent with regard to the siting and appearance of:


The installation of a 22.5m high mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment. The installation of 3 no. equipment cabinets, 1 no. meter cabinet and ancillary development within a 1.8m height compound.

¹ Macro or Micro

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

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 Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
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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?	Yes	No
If no explain why: No mast register exists. A physical search of the area was undertaken prior to the selection of a suitable site, to identify any potential opportunities for mast or site sharing.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:		


Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised: A description of the proposal and drawings were sent to Kirklees Council by email on 12th April 2024. No responses have been received to date.	

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Annual area wide information to planning authority

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


Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
<p>Outline of consultation carried out:</p> <p>A description of the proposal and drawings were sent to the Cleckheaton ward Councillors, John Lawson, Andrew Pinnock and Kath Pinnock, and to MP Kim Leadbeater, on 12th April 2024.</p>			
<p>Summary of outcome/main issues raised (include copies of relevant correspondence):</p> <p>No responses received to date.</p>			

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School/College

Location of site in relation to school/college (include name of school/college): None in proximity.
Outline of consultation carried out with school/college (include evidence of consultation): N/A
Summary of outcome/main issues raised (include copies of main correspondence): N/A

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

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


Developer's Notice

Copy of Developer's Notice enclosed?	Yes	No
Date served:	22nd April 2024	

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3. Proposed Development

The proposed site:

This application seeks consent with regard to the siting and appearance of:

The installation of a 22.5m high mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment. The installation of 3 no. equipment cabinets, 1 no. meter cabinet and ancillary development within a 1.8m height compound.

There is an existing rooftop site on Cleckheaton West End Centre which currently serves the area. This site needs to be upgraded to provide the latest technologies and frequencies to VMO2's customers. In order to fit into the operator's single grid network, an additional new greenfield style base station is required for this upgrade to VMO2's service in close proximity of the existing site that will be retained and in due course upgraded for improved Vodafone service.

Any replacement site must be in close proximity to the existing to replicate and improve upon the existing coverage pattern. Where the existing coverage pattern is not replicated then this creates new gaps in coverage which then require additional masts to plug these newly created gaps. Therefore, the most efficient way to address the requirement and prevent the need for new additional masts in the locality, is to replicate the existing coverage pattern as closely as possible.

A new location has been found on the CU Phosco Lighting premises on the southern side of Westgate – approximately 488m to the south-east of the current location.


The site is proposed on the north-western corner of the car park adjacent to Westgate. Westgate is a single-carriageway with wide pavement and trees standing between the proposed site and the road. Adjacent to the proposed site location is commercial premises, as is the case for most of the property on this southern side of Westgate. There are streetlights near to the site, highways street furniture and signage in the wider area which would help the installation to assimilate into its surroundings at this location. To the east of the site is Cleckheaton Fire Station and also many other commercial units make up the surrounding area. There are houses on the northern side of Westgate however they are separated from the site by wide pavement and tall trees and the proposed installation would not be out of character in this largely business-use area.

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The proposed location is shown below:



Please see section below for the proposed dimensions, materials and colours.

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

N/A – to replicate and improve upon existing coverage pattern.

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

Description:


The installation of a 22.5m high mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment. The installation of 3 no. equipment cabinets, 1 no. meter cabinet and development ancillary within a 1.8m height compound.

Overall Height:	22.5 Metres
Height of existing building (where applicable):	N/A Metres
Equipment Housing: ERS Rack Cabinet X 2	
Width:	0.65 Metres
Depth:	0.70 Metres
Height:	2.00 Metres
Equipment Housing: Percy PSU Cabinet	

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Width:	0.72 Metres
Depth:	0.85 Metres
Height:	2.10 Metres
Equipment Housing: GFMC Meter Cabinet	
Width:	1.00 Metres
Depth:	0.45 Metres
Height:	1.00 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Monopole – steel – galvanised
Equipment housing – type of material and external colour:	Cabinets - steel – grey RAL 7035

Reasons for choice of design, making reference to pre-application responses:

In designing the proposed installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practicable. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree.

There are three main elements to a radio base station;


- the supporting structure that holds the antennas in the air or fixes them to a building or structure
- the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units)
- and the cabin or cabinets which contain the equipment used to generate the radio signals
- Other elements necessary for the base station to function are the power source, feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as “development ancillary to” the base station.

In terms of design, a slim and unfussy design of support structure has been chosen. The monopole design of support structure is the most appropriate and available design for urban environment. This structure has been selected over other available design such as a lattice tower with an open headframe and level antennas and is free of ancillary equipment such as tall fencing, or larger cabinets. The finish of the monopole and cabinets is proposed to be grey to match the existing street furniture and to blend into the surroundings.

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A headframe is proposed to be mounted at the top of the monopole, this allows for more targeted coverage by allowing for better positioning / orientation of the antennas. 6 no. antennas are proposed to be located on the headframe at the top of the monopole. Associated ancillary equipment is proposed underneath the antennas. This equipment is generally small and is designed to make the antennas more efficient, allowing the amount of ground based equipment cabinets to be reduced and ensuring that a simple design solution can be proposed. The antennas are proportionate in scale to the mast and will not be overly prominent within the landscape when considered in the context of the proposed installation.

The cabinets are of a type commonly seen on the street and are low level structures that, when viewed in the context of the street scene, will not be obtrusive features; they will also be painted grey, a colour typical for street furniture.

Whilst the proposed colour scheme has been selected taking into consideration the specific site context, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority.

In terms of the height of the proposed structure, it is acknowledged that the mast would be taller than the existing street furniture and trees. This is necessary as the site is proposed to provide 5G services. 5G uses higher frequencies which do not propagate through material and potential obstructions as well as lower frequencies (such as 4G), thus there is a need to ensure that antennas are able to over-sail surrounding buildings and trees, enabling the required coverage to reach the required extent of the target area.

This height also takes into account a need to accommodate multiple technologies in one installation for two operators. These technologies are stacked on top of each other. The need to provide modern 5G signal and multiple technologies in once mast, is therefore a driver of the height of the installation.

2 no. dishes are proposed to provide a link back into the wider network. These are proposed under the antennas and other ancillary equipment on a small bracket.


In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum within the context of the technical constraints to design.

There is street furniture and a highways environment surrounding the site all of which will provide a backdrop and context to the proposed development and assisting in minimising visual impact.

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It is considered that the proposal strikes an appropriate balance between operational and environmental considerations.

Health and Safety - including ICNIRP compliance

This application is supported by a certificate of ICNIRP compliance. Para 122 of the NPPF (2023) states: Local planning authorities must determine 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.

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

As part of VMO2's (trading as O2) continued network improvement program, there is a specific technical requirement to provide new 5G coverage in this area of Kirklees.

There is an existing shared rooftop site in proximity which currently serves the area for both VMO2 and Vodafone. The existing site cannot be upgraded to accommodate the needs of both operators due to technical constraints and as such a replacement installation is needed to serve one of the operators, in this case VMO2, to meet this requirement.

In order to fit into the operator's single grid network, a replacement site is needed in close proximity of the existing to replicate and improve upon the existing coverage pattern.

Mobile connectivity and service is required where customers live, work and play.


The increasingly high level of mobile phone use and ownership within the UK population is a very clear indication of the public's overwhelming acceptance of the benefits of mobile communications, which requires the installation and maintenance of base stations to provide the necessary connection between the mobile phones and the UK telecommunications network.

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Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles will not work. They are made up of three main elements. The cabinets which contain the equipment used to generate the radio signal. The supporting structure such as a mast, which holds the antennas in the air and the antennas themselves. Only the antennas emit radio signals.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchanges by cables or wireless technology such as microwave dishes, to create a network. The area each base station covers is called a cell. Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills, which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.


The replacement site will accommodate all the technologies for VMO2 and the 'cell' will benefit from improved service provision including new 5G coverage.

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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
D1 - Rooftop	Existing RT site, Cleckheaton West End Centre, Woodroyd Mills, Cleckheaton, Kirklees, BD19 3AF	418278, 425423	This is the existing rooftop installation providing coverage for the area; however, it cannot accommodate both operators latest requirements. In order to fit into the operator's single grid network, an additional new greenfield style base station is required for this upgrade to VMO2's service in close proximity of the existing site that will be retained and in due course upgraded for improved Vodafone service.
D2 - Rooftop	Fire Training Tower, Hightown Road, Cleckheaton, Kirklees, BD19 5HD	418754, 425166	The 4-storey training tower was investigated; however, the tower is not structurally capable of accommodating the required equipment. For this reason, this option has been discounted.
D3 - Rooftop	Lion Sweets Factory, Taylor Street, Cleckheaton, Kirklees, BD19 5DZ	418281, 425204	The brick chimney at the factory was investigated as a potential option, however, the chimney is quite narrow and isn't substantial enough to support the required equipment. Also, difficult to access for build and maintenance. For these reasons this option has been discounted.

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D4 - Streetwork	SW outside ATS, Westgate, Cleckheaton, Kirklees, BD19 5HS	418656, 425173	Potential street works location, however, the pavement is too narrow to support an installation and allow for the required pedestrian clearance. For this reason, has been discounted.
D5 - Streetworks	SW on Westgate / Stone Street, Westgate, Cleckheaton, Kirklees, BD19 5HS	418339, 425183	As above, the pavement in the area has been investigated, however, it is too narrow to support an installation and allow for the required pedestrian clearance. For this reason, has been discounted.
D6 - Streetworks	SW on Westgate /Hightown Road, Westgate, Cleckheaton, Kirklees, BD19 5HS	418776, 425191	The grass verges at the junction has been investigated but the existing lamppost on the eastern side makes the grass verge too narrow for an installation. The western side has overhead cables and road signs that would not allow a telecoms site to be built. For these reasons this option has been discounted.
D7 - Streetworks	SW on wide pavement, Westgate, Cleckheaton, Kirklees, BD19 5HS	418684, 425176	Space within the pavement for a sgtrewetworks installation at this location, however, would be closer to residential development and also has less natural screening and is more open in nature than the proposed option. The selected option also benefits from a backdrop of trees and intervening vegetation which will provide some screening from certain vantage points. Discounted in favour of the proposed option.
D8 - Streetworks	SW on Stone Street, Cleckheaton, Kirklees, BD19 5HS	418352, 425181	The pavement in the area has been investigated, however, it is too narrow to support an installation and allow for the required

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			pedestrian clearance. For this reason, has been discounted.
D9 - Greenfield	Storage land / Garden, Prospect Road, Cleckheaton, Kirklees, BD19 3AZ	418666, 425424	Pavement location is more exposed to the residential properties within the vicinity than the preferred option and a site at this location would have a greater visual impact than the proposed location. Discounted in favour of the proposed option.
D10 - Greenfield	Trendy Tuft Car Park, Gladstone Street, Cleckheaton, Kirklees, BD19 3BG	418724, 425384	Greenfield site within the car park of the vacant commercial units car park. Any greenfield site at this location would have coverage to the north blocked by the 3/4 storey mill. For this reason, has been discounted.
D11 - Greenfield	ATS Tyres Car park, Westgate, Cleckheaton, Kirklees, BD19 3NJ	418659, 425138	The ATS Car park was investigated, however, it is used for storage and there is not enough space to accommodate an installation. Also, a site at this location would have coverage to the north blocked by the 3/4 storey mill. For these reasons this option has been discounted.
D12 - Greenfield	Prospect Mill, Prospect Mill Meadows, Cleckheaton, Kirklees, BD19 3AZ	418707, 425459	This is an existing rooftop site that hosts other operators' installation. The existing stub mast would require redevelopment resulting in a greater height and a more robust structure to accommodate the required equipment. This would result in greater amenity impact than the selected location. For this reason, this option has been discounted and favour of the proposed site.

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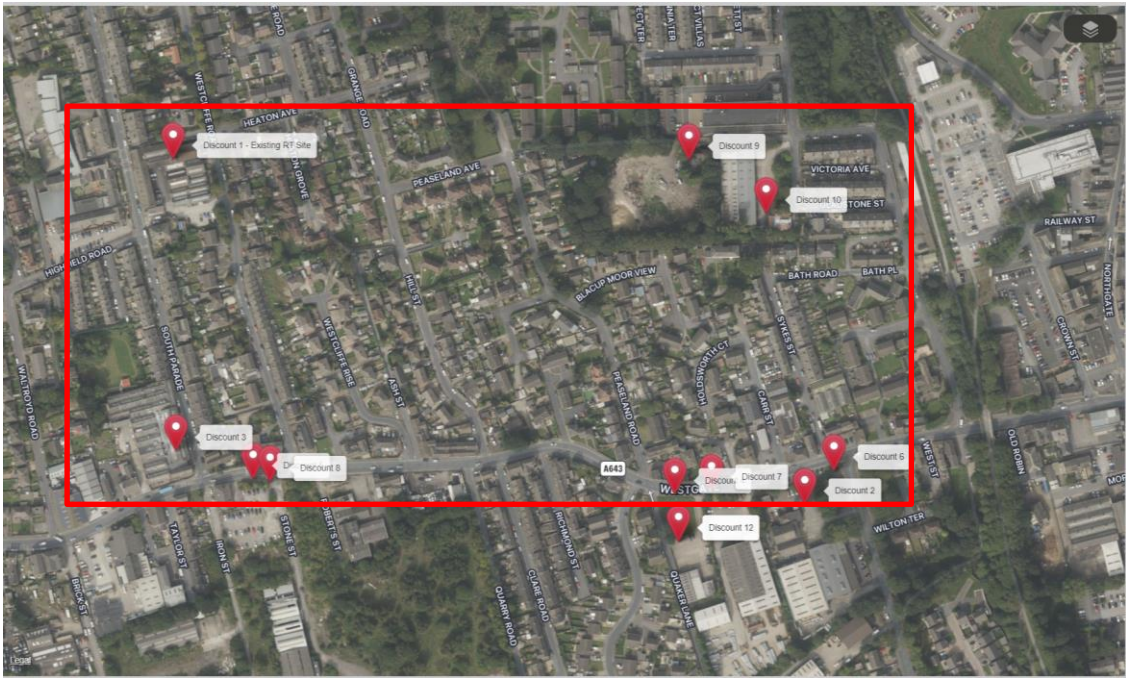


Figure 1 - Map of discounted options and search area

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

N/A - alternative locations set out above.


The site location has been selected using a relatively small and targeted search area which is influenced by the position of the existing mast and the existing coverage pattern which must be replicated and improved upon by the new installation. If the mast is incorrectly sited or is not designed in such a way to provide the optimal coverage levels, then it will create new gaps in the network. These gaps then require additional masts to fill in the coverage in these areas. For this reason, it is important that any new mast is able to ensure that it replicates the existing coverage pattern as closely as possible to reduce the number of masts in the locality and prevent a proliferation of masts within one area.

This means that the target search area is very limited and that opportunities to site a new mast are also very limited. Discounted options have been considered above, these remain fairly localised to the existing rooftop site, this is because anything beyond this immediate area would not be able to meet the technical requirements of the operators and would fail to meet the primary aim for this new site – to provide upgraded coverage to VMO2's customers within the area.

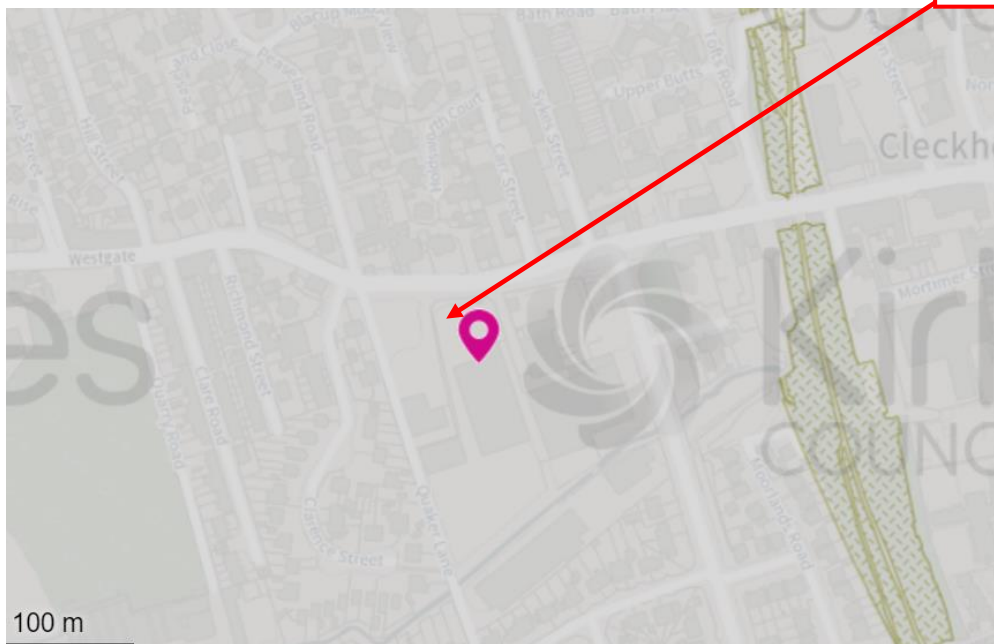
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Land use planning designations:



There are no sensitive designations over the site or in the immediately surrounding area.

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

PLANNING POLICY


The following documents are considered relevant to the assessment of this application:

- The Town and Country Planning (General Permitted Development) (England) (As Amended) - Schedule 2, Part 16
- National Planning Policy Framework (2023) – Chapter 10, Supporting High Quality Communications Infrastructure
- National Planning Policy Guidance
- Code of Practice for Wireless Network Development (2022)
- Kirklees Local Plan (adopted on 27 February 2019) – No Specific Telecommunications Policy. General design policy

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Kirklees Local Plan 2019

Although there is no telecommunications policy within the Local Plan, the policy justification of Policy LP4 states within section 6.15 that:

“The NPPF states that the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change should be assessed to test the ability to meet forecast demands. Strategic infrastructure needs including nationally significant infrastructure should also be considered.”

This new installation is being proposed in order to address the escalating requirement for efficient up-to-date telecommunications services in this area of Kirklees.

Section 7.6 declares that, in the interest of assisting in the creation of new jobs in a variety of ways, the Local Plan will facilitate “improvements to transport and telecommunications”.

This proposal will provide a much-needed improvement to the service currently provided by the shared rooftop installation at Cleckheaton West End Centre that is not able to be upgraded to meet demand.

Section 11.8 reads:

“Development proposals should give full prior consideration to how infrastructure and utilities are provided within the site, and how these can be serviced with the least disruption, with provision made for ducting for cables. Broadband provision is an important consideration throughout the district and applicants should support the roll out of superfast broadband provision in the district. All telecommunications infrastructure should be capable of accommodating changes in technological requirements, without having a negative impact on the streetscene.”


The proposed new installation will provide superfast broadband provision to the district by accommodating the equipment required to make this possible, however will not have an unacceptable impact on the streetscene given its location within the Phosco Lighting premises and the natural and existing screening/backdrop provided by the tall trees to the front of the premises and the existing streetlamps and telegraph poles lining the pavement of Westgate.

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Planning Assessment Principle of Development

This is a prior approval application. As such, the only issues that can be considered when assessing this application are the siting and appearance of the proposed telecommunications monopole and cabinets. The principle of development is therefore not an issue of consideration for this prior approval application.

Notwithstanding this, it is useful to highlight the following paragraphs of the National Planning Policy Framework:

The NPPF directly addresses the need for enhanced wireless communication services, at paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"

Chapter 10 [Para's 118-122] (Supporting High Quality Communications) is most relevant to this application.

Paragraph 118 states that "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections".

Paragraph 119 states that "The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged".

It should be noted that **paragraph 122** states that "Local planning authorities must determine 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".


This proposal seeks to expand the electronic communications network to provide advance, high quality and reliable communications infrastructure in accordance

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with para 118 of the NPPF. This installation is proposed following an identified need for an additional base station to meet customer demands, to ensure the efficient operation of the network and provide reasonable capacity for future expansion. The operators have taken a sequential approach to development and has explored the use of existing masts, sites and buildings however, a new greenfield installation is considered to be the only appropriate solution to deliver the required levels of coverage within the target area in accordance with para 119 of the NPPF.

Siting and Appearance

As set out above, there is a requirement to upgrade existing coverage to the area to allow VMO2 to enhance its existing 4G network capacity and to provide new 5G capability to the surrounding area. There is an existing rooftop site in proximity which currently serves the area for both VMO2 and Vodafone. The existing site cannot be upgraded to accommodate the needs of both operators and as such a replacement installation is needed to serve one of the operators, in this case VMO2, to meet this requirement.

There is no specific telecommunications policy within the Kirklees Local Plan. However Policy LP24 of the Local Plan states that good design should be at the core of all proposals in the district and should be considered at the outset of the development process. Policy LP24(a) states that proposals should promote good design by ensuring the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape. Section B and C of Policy LP24 of the Kirklees Local Plan states that development should: "...maintain appropriate distances between buildings" and "...minimise impact on residential amenity of future and neighbouring occupiers."


In terms of siting, following technical review by qualified radio planners, designers and town planners, this location is considered to be the most appropriate site, in the absence of viable alternatives, which can balance the technical requirements of the operator and planning considerations within the required cell boundaries. A physical search of the area has taken place, and the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures and is unable to find a suitable and/or available alternative which also meets planning considerations. As such a new mast is proposed to meet customer demand within this area.

The search area for a mast / installation is selected through technical assessment by a qualified radio planner and is based on technical data which shows the areas within which masts are required. The extent of the search area is shown by the red box on Fig 1 above – Map of discounted options. In this instance the search area is around the existing site located on the rooftop of Cleckheaton West End Centre. A site must be located in close proximity to the existing to ensure that the existing coverage

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pattern is replicated and improved upon. If the coverage pattern is not closely replicated, then this can create the need for additional installations in the future to infill gaps in the network that are subsequently created by not replicating the existing coverage pattern. There is limited scope to move the search area from where this assessment determines, as doing so may mean that the mast would not service the intended target area and could also interfere with adjoining masts which are located within the locality. By proposing the site in this location, the requirement can be met through the one installation which prevents the proliferation of masts in the locality in accordance with the NPPF.

The site is proposed to the front of the CU Phosco Lighting car park with wall and fencing which marks the boundary of the adjacent road. Westgate is a single-carriageway with wide pavement and trees standing between the proposed site and the road. Adjacent to the proposed site location is commercial premises, as is the case for most of the property on this southern side of Westgate. There are streetlights near to the site, highways street furniture and signage in the wider area which would help the installation to assimilate into its surroundings at this location. To the east of the site is Cleckheaton Fire Station and also many other commercial units make up the surrounding area. There are houses on the northern side of Westgate, however they are separated from the site by wide pavement and tall trees and the proposed installation would not be out of character in this largely business-use area.

The installation would take up a small area of land in a commercial / employment setting. It is not considered that the introduction of telecommunications infrastructure would greatly disturb the way the land is used or understood or the character of the area, particularly when weighed against the benefits of providing improved coverage to this area of Kirklees.

The site will be assimilating into its surroundings as an additional grey pole in this urban location against the backdrop of existing street furniture and commercial premises, and it will be viewed in the context of the functional nature of the area. For these reasons the siting of a mast will not result in unacceptable harm to character or the environmentally sensitive areas within the surrounding environment. Every effort has been taken to minimise impact through appropriate siting and use of natural screening, resulting in a high-quality design of appropriate form, scale, layout and acceptable amenity impact in accordance with policy LP24 of the Local Plan.

In terms of appearance, the design and type of equipment to be deployed has been chosen to provide the greatest possible coverage while, so far as is practicable, minimising the impact on character and amenity.


The design of the installation involves a relatively slimline monopole with open headframe, ancillary equipment contained within small cabinets at ground level and

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no fencing, means of enclosure or large area of hard standing around the site. This design has been selected over other available options which use bulkier and wider masts or lattice towers with open headframes, level antennas, larger cabinets or cabins, visible lengths of cable and trays, high chain-link or palisade fencing and a larger area of hard standing.

The height of the installation at 22.5m has been proposed to provide the best possible levels of coverage to the local area and to allow clearance of local clutter such as buildings and trees. The height has been selected following an on-site design visit and is informed by technical data.

It is acknowledged that the installation would be taller than the existing street furniture. Technical requirements dictate the height of the installation and mean that in this instance it is not possible to lower the height. 5G signal is prone to 'clipping' which means it does not pass well through different materials and needs a clear space free of obstructions (such as trees and buildings) to deliver signal. As such, there is a need to ensure that the antennas are able to rise above any such obstructions. As 5G is much more susceptible to 'clipping' and cannot travel as far as lower frequencies, a series of new installations, such as this, which are taller in height are being proposed across the country to accommodate the delivery of 5G coverage.

A simple design solution has been selected to minimise harm to the surrounding area and balance technical considerations / performance. Para 67 of the Code of Practice acknowledges constraints to 5G development and mast design and supports a simple design solution. It states *"Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis"*.


It is acknowledged that the installation would be visible, however the installation would be read in the context of the existing street furniture in this environment. The siting of the mast in the commercial / employment location within the car park is in keeping with the existing character of the area – where street furniture is generally more prevalent and accepted.

Balancing siting and appearance of mobile phone masts against operational efficiency can be challenging and every effort has been made in this case to ensure that the mast is proposed in the best possible location and is of the best possible appearance given the technical and planning constraints which exist. It should be acknowledged by the LPA that operators are limited on the options for where equipment can be located and how it appears, particularly with regard to the emergence of new technologies such as 5G which require different considerations

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than previous technologies. The location as selected is considered to be the least detrimental location within the required search area.

While seeking to ensure high standards of design, the environmental, social and economic benefits that telecommunications development can bring need to be weighed up proportionately. It is considered that the scheme as proposed is able to bring substantial benefits which should weigh in favour of the scheme.

Other relevant information:

The public benefits associated with providing 5G coverage weigh heavily in favour of the development and can be summarised as follows.

Public Benefits Associated with Improved Coverage and New 5G Coverage

Mobile telecoms networks are now ubiquitous throughout the UK. Individuals and businesses expect to be able to connect and use their mobile device whenever and wherever they so require. Access to quality mobile communication services is an essential utility for the residents, businesses and for commuters that travel through an area daily.

High quality communications infrastructure is essential for sustainable economic growth. Mobile connectivity allows business to be carried out on the move, enables access to information and services anywhere, and opens new opportunities and markets. Telecommunications networks also play a vital role in enhancing the provision of local community facilities and services.


5G is expected to broaden the role that mobile technology plays in wider society by enabling thousands more 'smart' devices on the street which connect to the internet and each other. This will pave the way for new virtual and augmented reality services and help drive the take-up of new innovations such as autonomous cars and remote healthcare technologies. And it could transform the way public services are delivered - such as energy and transport - by allowing greater real-time monitoring and responsiveness in order to reduce waste, pollution or congestion.

At the time of writing, the critical nature of these services has been made ever more apparent. Restrictions on travel resulting from the Coronavirus pandemic has resulted in a continued shift from office based to home working, from physical professional and social gatherings to virtual ones and to reliance on online shopping and entertainment services. Usage within suburbs and peripheral areas has therefore increased dramatically as less people travel to town and city centres.

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The recently published 'Online Nation Report' (June 2022, OFCOM) is supportive of this statement, finding that *"The global pandemic since March 2020 has resulted in significant changes in online behaviour; in particular, our online shopping habits that developed during lockdown periods appear to be here to stay. Overall, online companies grew in 2021. 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' increasing spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online."*

The more recently published 2023 Online Nation report finds *"Data from Ipsos iris shows that 47.9 million UK adults accessed the internet across smartphones, tablets and computers in May 2023 (our sample month), spending an average of 3 hours 41 minutes a day online, a modest increase of 8 minutes year on year (May 2022: 3 hours 33 minutes). Young adults continue to spend the most time online, with 18-24-year-olds spending a daily average of 4 hours 36 minutes, and the 65+ group spending the least time (2 hours 46 minutes). Women continue to spend more time online (3 hours 58 minutes, up 12 minutes on May 2022) than men (3 hours 23 minutes, up by 3 minutes). Online adults in Wales spent the most time compared to the other UK nations (3 hours 47 minutes), while those in Scotland spent the least (3 hours 38 minutes)"*.

Ofcom's 2023 communications market report (interactive data published in July 2023) reaffirms the importance of mobile technology in the UK. The average monthly data volumes per mobile data user increased by 1.2 GB (22%) to 6.6GB in 2022. The total number of mobile subscriptions also increased by 3% to 111.8 million in 2022.

It is clear therefore that data-based technologies, such as 4G and 5G services (provided by this proposed development), are increasingly important to our everyday lives, even during more normal circumstances.


This importance has been reaffirmed in a letter from Matt Warman MP, the previous minister for Digital Infrastructure, to English Local Authority Chief Executives. The letter dated 24 May 2021 accompanied the 'Consultation on Changes to Permitted Development Rights for Electronic Communications Infrastructure' and states:

"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 planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity."

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Upgrading digital telecommunications is evidently a key Government priority and one that is also set out in detail in the NPPF (2021) and summarised within the DDCMS Connected Growth Manual (2019). Furthermore, the Government wants the UK to be a world leader in 5G and has set a target for "the majority of the UK population to have access to a 5G signal by 2027" (House of Commons Library, Building Telecommunications Infrastructure, August 2021). Critical to achieving this is the ability of operators to deploy appropriate infrastructure and in this instance, provide replacement sites to ensure the continuation and development of these services, when existing sites are removed from the network.

Differences between 4G and 5G

In their recent #checkthefacts campaign, Mobile UK highlight the biggest differences between 4G and 5G. These are broadly summarised as:

- Quicker speeds
- Improved latency - Time taken for information to travel from sender to receiver
- Improved capacity - more devices can be connected at one time
- 5G Networks can be sliced – allowing dedicated and reliable networks for local services (such as the emergency services) and individual businesses.

The new installation will bring next generation technology. The full extent of benefits of 5G technology is still unknown and will, to a significant degree, depend on the ability to provide a comprehensive network coverage. However, the possibilities and potential of the technology seem endless. If allowed, residents and visitors will benefit from:

Much faster download/upload speed and latency – delays between information sent and received will become virtually impossible to perceive; real-time content sharing and data will become a reality. This will effectively make buffering and loading delays a thing of the past, with data only taking 1 millisecond to be received by a device after it has been requested – it currently it takes up to 60 milliseconds.

Multiple Devices can be connected – countless devices will be able to access mobile online services at the same time; it will mean you can always stay connected. For example, if you are at a football stadium or a crowded festival with everyone trying to simultaneously upload and share their experiences to social media without loss of connection.


Improved home working – 5G rivals the speed of fibre broadband and can provide much needed connections where internet connections are still poor and in need of updating. Everyone will have access to fast and uninterrupted sharing, streaming, and browsing via their mobile phone network. It will mean accessible near-gigabit-

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capable speeds when you are out and about and could, in the future, work alongside or provide an alternative to fibre and wires in the home.

5G supports the development of the "Internet of Things". This encompasses all the 'smart' and connected devices we're starting to see in homes and beyond, from smart light bulbs and thermostats, to connected kettles, security cameras and more, most of which can be controlled by an app on a mobile phone, or by voice when paired with an AI Assistant such as Amazon Alexa. In some cases, they can even be automated, with lights for example turning on when entering a room and turning off when leaving it. They do this in part by communicating with each other, for example, motion sensors at a room entrance could adjust lighting when people enter or leave a room.

Smart Cities – it also supports the development of "Smart Cities" which develops the "Internet of Things" beyond homes and out into the world to make cities smarter. Examples include traffic lights that can adapt automatically based on traffic flow, automatic deployment of road repair vehicles when potholes are detected, smart power distribution (e.g. so that buildings are not being lit when they are empty) and rubbish bins automatically reporting when they require emptying, all leading to cleaner, safer, more efficient cities, and all with minimal human oversight.

Cars of the future – When connected to 5G, the cars would communicate and share data with other vehicles and connected infrastructure, avoiding accidents and traffic as a result, and telling smart cities where traffic is building up, so routes for other vehicles can be adjusted. This will also play a large role in self-driving cars, with its speed and reliability key to them rapidly sending and receiving information about the road and other vehicles.

The Environment – 5G connected devices will allow us to reduce our energy use and emissions, so we have a less negative impact on the environment. Multiple devices will connect to each other, so they know when they're in use and powerup or down accordingly. 5G will allow us to download data in a more efficient way, so we use less energy. Smart energy meters will help us reduce household energy use, and smart transport systems will help us produce fewer emissions when we travel.


More information on 5G and its benefits can be found at <https://www.mobileuk.org/5g-benefits>.

Mobile UK also have a useful Local Authority Toolkit which can be viewed through the following link <https://www.mobileuk.org/5g-local-authority-toolkit>.

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

There is a requirement to upgrade the VMO2 network in the area to provide improved coverage and capacity, most notably in relation to 5G services, but also in relation to 4G services.

The first generation of services provided voice calls, the second generation (2G) allowed basic data such as texting and the third generation (3G) offered internet access and the development of apps. Since then, the smart phone has developed further, and the fourth generation has brought video and much faster data speeds allowing the integration of the smart phone into wider use.

The next generation of mobile telephony is 5G which brings greatly increasing data speeds. The advantages this presents range from near-instant downloads of HD films to connected cars, smart medical devices, and smart cities. To bring this new technology VMO2 will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use leaving gaps in the network.

Although 5G will undoubtedly bring new opportunities and huge benefits to society, we cannot escape from the requirement that new structures, antennas, and ancillary equipment will be needed. It has been acknowledged by Government that we must ensure that we have the infrastructure in place to deliver 5G across our major centres and transport networks. This is one of the many additional structures that will be needed to provide enhanced services.

The higher frequencies that 5G will use can provide more bandwidth and thus greater capacity but the signal will not travel as far as those of previous generations. The implications to the built environment will be that more infrastructure needs to be deployed, as in this case.

Education:

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


5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR)

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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.

Summary

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service.

This development proposes improved coverage to the surrounding area for two operators. The proposal represents an appropriate siting and design solution for this area, balancing environmental and planning considerations.

A simple design solution is proposed to mitigate visual impact and prevent harm to the local environment. The relatively minimal impact of the development would be outweighed by the significant public benefits of the new super-fast coverage to the area.

The proposed development is compliant with the relevant policies from the NPPF, Code of Practice for Wireless Network Development in England (2022) and the views of the Kirklees Local Plan (2019), as outlined within this supporting statement. The proposal is fully compliant with ICNIRP guidelines and declaration of compliance has been provided.


As such, it is respectfully requested that this application is approved.

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Confirmation that submitted drawings have been checked for accuracy

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Date: 29th April 2024


Signed: **Redacted** Company: Sinclair Dalby Limited
(On
behalf of
Cornerstone and
above
operator
)

Position: Director Telephone: **Redacted**

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