

SUPPLEMENTARY INFORMATION

The operators (EE and Three) currently provide coverage to the area from Victoria Mill, Carr Street, Wakefield, WF15 6EE (NGR: E420243, N424250). The existing site serves the A638 and the wider residential and commercial areas on behalf of EE, Three and ESN (Emergency Services Network).

As can be seen from Image 1 below, Victoria Mill is host to telecommunications infrastructure which is operated by EE, Three and ESN (Emergency Services Network).



Image 1: Existing NTQ Site on Victoria Mill

A Notice to Quit (NTQ) has been served on the operator due to concerns over the structural integrity of the existing building and as such a replacement must be identified.

Prior approval for the siting of a slimline 25m high lattice mast under LPA Ref: 2021/N/94739/E was approved in 2022 (See Image 2 below). The operators demand has now changed which has resulted in a change of design hence this re-submission for a 25m monopole in the same location. The proposals replace those granted under LPA Ref: 2021/N/94739/E.

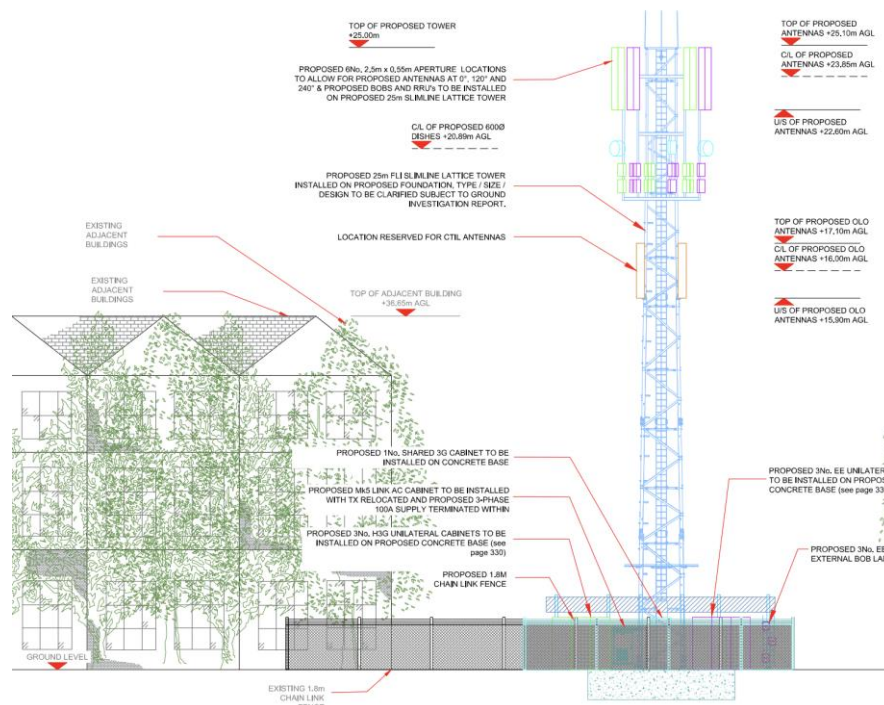


Image 2a: Elevation of previous proposals approved under LPA Ref: 2021/N/94739/E. These proposals are superseded by the current proposals.

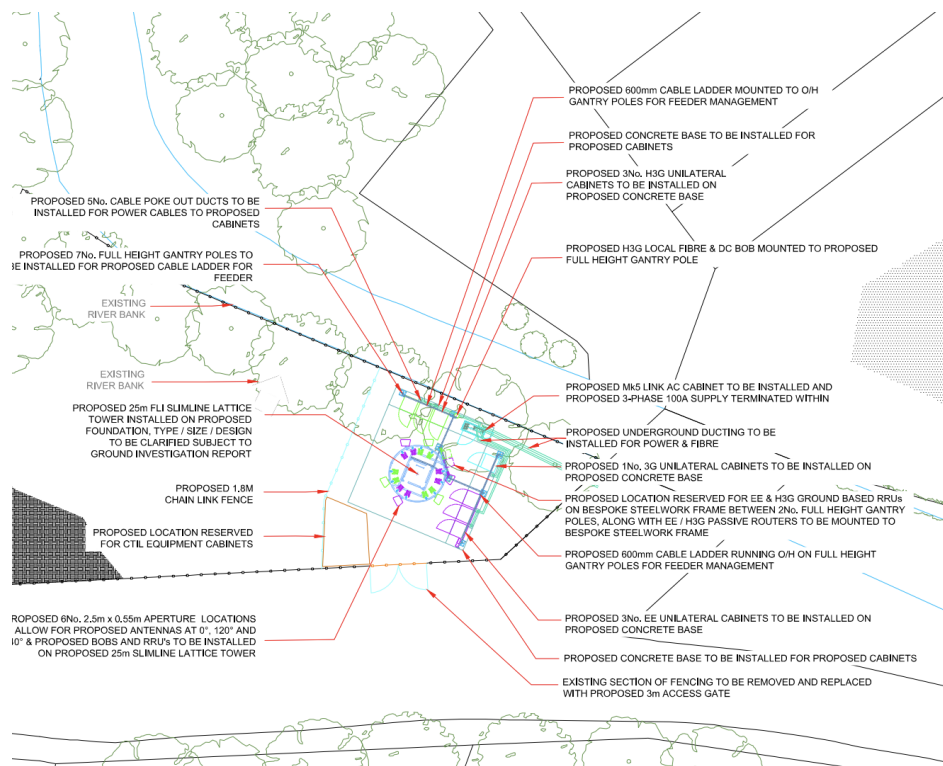


Image 2b: Block plan of previous proposals approved under LPA Ref: 2021/N/94739/E. These proposals are superseded by the current proposals.

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

A replacement installation at the application site will ensure that the latest high quality 4G coverage is maintained and enhanced and new 5G provision is provided in and around this area of Liversedge, Wakefield for EE and Three and the Emergency Services Network.

1. Site Details

Site Name:	Victoria Mill	Site Address:	Land at Victoria Mill
National Grid Reference:	E: 420239 N: 424196		Carr Street Wakefield WF15 6EA
Site Ref Number:	92440	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?	Yes	
If no explain why: N/A		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	24/02/2025
Name of contact:	N/A

¹ Macro or Micro

Summary of outcome/Main issues raised:

A pre-application consultation letter and drawings of the proposal were sent to the Local Planning Authority by email on 24/02/2025.

No formal response was received at the time of making the application.

Due to the timescales and the need to replace the existing site urgently to allow the landowner to progress with their works, a formal pre-application enquiry was not progressed in this instance.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Freshwave are a neutral host provider and therefore they do not have sight of the mobile network operators' full roll-out update plans.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline of consultation carried out: Pre-application consultation was carried out with the local councillors for the Liversedge and Gomersal Ward and Kim Leadbeater MP. Pre-application consultation letters and drawings of the previous proposals were sent to these parties on 24/02/2025.			

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

Redacted

A response was sent to confirm the location of the old golf course for investigation and to confirm that prior approval for the siting of a slimline 25m high lattice mast under LPA Ref: 2021/N/94739/E was approved in 2022. The operators demand has now changed which has resulted in a change of design hence this re-submission for a 25m monopole in the same location. The proposals replace those granted under LPA Ref: 2021/N/94739/E.

No other responses have been received at the time of making the application.

School/College

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

- Littletown Junior Infant & Nursery School

Outline of consultation carried out with school/college (include evidence of consultation):

Pre-application consultation letters and drawings of the previous proposals were sent to the Headteacher/Chair of Governors of the above school, by email, on 24/02/2025.

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

Redacted

A response was sent to confirm the planning application will be supported by an ICNIRP (International Commission on Non Ionizing Radiation Protection) certificate which ensures the proposal complies with regulations and Ofcom/WHO guidance.

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	Developers Notices sent via Tracked Email 16/04/2025.	

3. Proposed Development

The proposed site: Background Freshwave are a neutral host provider who work to provide infrastructure for operators to share around the UK. The UK Wireless Infrastructure Strategy, published in April 2023, supports network densification through neutral host providers, such as Freshwave. It states: <i>"Newly emerging operators including... neutral host providers – have a key role to play in delivering advanced wireless connectivity..."</i> <i>5G brings with it the need to deploy higher bandwidth services using higher frequency spectrum. This means that mobile base stations will have to be places closer together, also known as network densification. Neutral host models of deployment (where a third-party deploys network infrastructure and provides access or capacity to multiple providers) will likely have an important role to play in this... They also help to minimise street 'clutter'. Neutral hosts lend themselves in particular to delivering smart city infrastructure, as a connectivity layer which can be shared by a multitude of services and applications...</i> <i>The use of public sector assets and land is likely to become increasingly important for the rollout of advanced wireless networks, including neutral host networks, particularly where extra capacity is required for services in high demand areas."</i>

The operators currently provide coverage and capacity to the area from an existing installation located on the rooftop of Victoria Mill (see Image 2 above). However, a legal Notice to Quit has been served on the operators. Notably, as previously stated prior approval was previously approved under LPA Ref: 2021/N/94739/E.

In order to ensure that the area is not left without coverage following the removal of the equipment to allow the demolition of the building, a replacement site is required. The Code of Practice for Wireless Network Development in England notes this requirement at paragraph 71:

"71. The Notice to Quit (NTQ) provisions within code agreements mean that sites have to be relocated . Where NTQs are proposed, the existing coverage and capacity will be removed and as such a replacement site is needed within close proximity to where the existing site was located."

Freshwave are therefore in the process of identifying a suitable site in the Liversedge area of Wakefield for a replacement radio base station for and on behalf of both EE and Three including coverage for the Emergency Services Network..

The existing site serves the A638 and the surrounding residential and commercial areas in the surrounding area.

Freshwave are limited in siting options as there is a requirement to provide equivalent replacement coverage and capacity and new 5G for this area of Liversedge, Wakefield. The replacement of an existing site means that the operator has to be located as close as possible to the existing installation in order to fit in with the surrounding network and to maintain the provision of equivalent coverage and capacity to the surrounding local area.

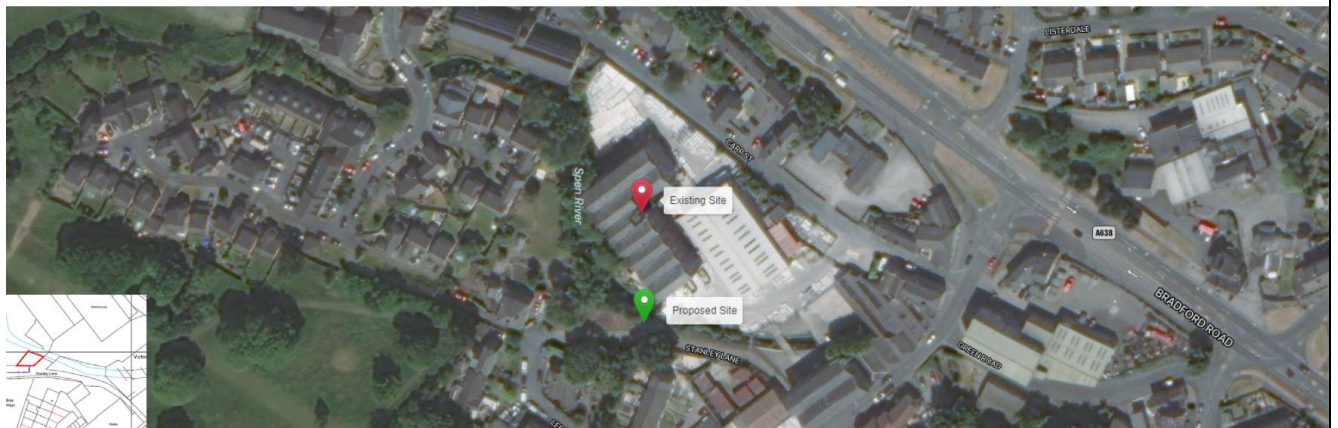


Image 3: The Existing Site (red) and the Application Site (green)

The proposed application site is approx. 50m to the south of the NTQ and is sited to the west of the A638.

The application site relates to a vacant parcel of land which is enclosed with a fence. The land is privately owned and set off an unadopted road, the site is somewhat secluded for this

reason. The site is set 32m away from the eastern side of dwellings to the west, and 24m away from the northern side elevation of dwelling to the south east and south west. Prior approval was previously granted for 25m lattice mast under LPA Ref: 2021/N/94739/E.

The proposed site does not fall within any sensitive designations.

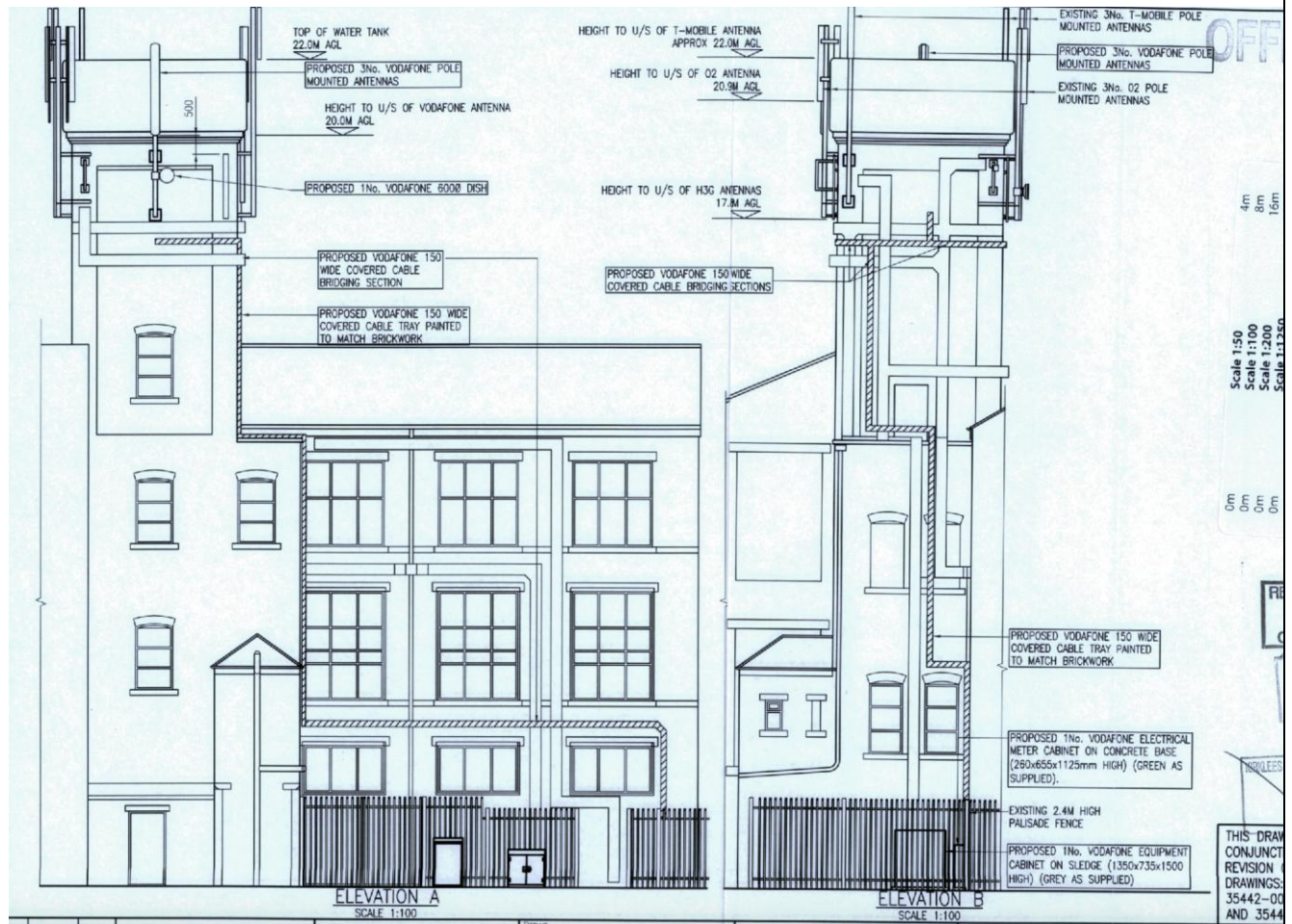


Image 4: Existing equipment atop of Victoria Mills (Source: Kirklees MBC)

The height of the existing rooftop antenna set to be removed are 22.0 metres above ground level. The replacement scheme is for a neutral host operator which allows the structure to be shared by multiple operators, this requires a monopole at a greater height to allow for adequate separation distance on the structure for each operator's equipment. The proposal will provide service provision for the whole of the target coverage area for all operators and avoids the need for multiple streetworks installations in the locality.



Image 5: View of the application site from Stanley Lane (Source: Google Maps)

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

Freshwave, on behalf of MBNL (EE and Three), are seeking to replace an existing telecommunications site on the rooftop of Victoria Mill, which needs to be removed due to the structural integrity of the building. The replacement site will be a shareable structure and will maintain 2G and 4G coverage and capacity as well as provide new 5G services to the surrounding area for the operators and the Emergency Services Network. This ensures high quality customer experience is maintained and up to date technology is provided as demands on the network increase and technologies change.

The 4G provision allows internet access, video calling, data downstreaming, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high quality indoor 4G services into this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G will deliver unparalleled speeds and capacity, with significantly reduced latency, which will be needed to deliver numerous innovative applications from autonomous cars to Internet of Things.

The EE network will also deliver the Emergency Services Network (ESN) critical communications system. This will replace the current Airwave service used by the emergency services in Great Britain (England, Wales and Scotland) and transform how they operate. ESN will transmit fast, safe and secure voice, video and data across the 4G network and give first responders immediate access to life-saving data, images and information in live situations and emergencies on the frontline. Investment in ESN will also mean improvements to 4G network coverage, which will enable 999 calls to be made securely from mobile phones in some of the most remote and rural parts of Great Britain. The technology that supports Airwave, the network currently used by our emergency services, is reaching the end of its lifetime. While reliable and fit for purpose for the immediate future, its limited capability means it cannot match the opportunities offered by new mobile critical communications technology.

ESN's high-speed mobile technology will mean communication between the emergency services will take priority over all other network traffic, even at peak times in busy urban locations. It will mean the emergency services and other first responders can share vital data, information and expertise quickly and securely from the frontline when it is needed most. It will give the emergency services access to the latest mobile communications products and applications as soon as they come on stream. They will be able to choose what meets their unique operational requirements from the tools and technologies available. Users for ESN include the police, fire and rescue and ambulance services as well as other users stretching from local authorities and utility services to first responders like mountain rescue. There are 300,000 frontline emergency service users who will depend on ESN, using handheld devices or operating equipment in 45,000 vehicles, 66 aircraft and more than 100 control rooms.

Type of Structure (e.g. tower, mast, etc): Monopole	
Description:	
The proposed installation of a telecommunications base station comprising a 25m monopole with a headframe supporting 9 no. antennas and 2 no. dishes, together with 7 no. ground based equipment cabinets and ancillary development thereto including compound fencing.	
Overall Height:	25 metres
Height of existing building (where applicable):	N/A
Equipment Housing x 7	
Length:	TBC
Width:	TBC
Height:	TBC
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel - Galvanised
Equipment housing – type of material and external colour:	Steel - Grey

Reasons for choice of design, making reference to pre-application responses:
<p>Freshwave have carefully considered the design of the proposed mast. The structure has been designed to be able to support the equipment for additional operators. A monopole is the most suitable design from a technical viewpoint, such a design is also able to facilitate greater coverage (as they give better scope for antenna orientation) and provide the structural capability required to be able to support the weight and size of all the operators telecommunications equipment. Due to the technologies that will be available from multiple operators at this location (2G, 4G and 5G services) 9 no. antennas need to be installed on two headframes at the top of the monopole.</p> <p>A streetworks style column cannot be utilised as they are not able to structurally support the weight and size of the MNO's equipment to enable the operators to share the same structure.</p>

A number of masts would be needed, throughout the local area. This would lead to proliferation and would have a much greater impact on the surrounding area. Such designs are also restrictive on the coverage that can be provided due to limitations in respect of the heights and bearings and therefore will not be able to provide the necessary coverage to the target coverage area. The more compromises on design, the less coverage and service provision that can be provided and the less benefits will be obtained.

The proposed height at 25 metres is essential to provide all the operator's equipment to reach the target coverage area. Given the underside height of the antennas is 22.80m and the whole of the antenna needs to be clear from obstruction, then if the mast were to be any lower in height, then it would not be able to clear the existing built and natural form including mature vegetation. This would fail the operators design brief to provide high quality coverage in this area of Liversedge and surrounding area of Wakefield.

The proposed equipment cabinets are small for telecommunications apparatus and proposed to be coloured grey. They will be enclosed within a chain link fenced compound and will not be overly noticeable outside of the site.

The site will be located within a fenced compound for health and safety reasons. The fence will provide screening for the proposed equipment cabinets and other ancillary ground based equipment, as well as the lower part of the tower.

The operator is proposing to install a structure which will be capable of delivering high quality replacement 2G and 4G services as well as new 5G services provision to the surrounding area for EE and Three and other MNOs as well as Emergency Services Network.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide replacement 2G, 4G and the latest 5G service provision, Emergency Services Network provision, delivering the capability required from a single network installation, would not appear out of place within the street scene.

Health and Safety - including ICNIRP compliance

An ICNIRP certificate is provided as part of this application.

International Commission on Non-Ionizing Radiation Protection Declaration attached	Yes	
International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions		

<p>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.</p> <p>When determining compliance, the emissions from all mobile phone network operators on or near to the site are taken into account.</p> <p>In order to minimise interference within its own network and with other radio networks, EE and Three operate their networks in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.</p> <p>As part of MBNL's network, the radio base station that is the subject of this application will be configured to operate in this way.</p> <p>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.</p> <p>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.</p>		
---	--	--

4. Technical Justification

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.

The National Planning Policy Framework states that local planning authorities should not question the need for the telecommunications system, which the proposed development is to support. However, for the avoidance of doubt as set out below the proposed installation is needed for MBNL (EE and Three), via Freshwave, to replace existing 2G and 4G coverage and capacity whilst also providing new 5G services to this area of Liversedge, Wakefield. This follows an NTQ (Notice to Quit) being served on the operator for the existing site that they currently utilise, on the rooftop of Victoria Mill.

The area within which an installation needs to be established in order to meet the coverage requirement is constrained by the location and extent of the coverage provided by the NTQ site and other existing installations in the surrounding area. As such, the search area for the replacement site centred around the existing site, with the technical guidance being to find a replacement site as close as possible to the existing in order to replicate the coverage footprint.

Without this replacement installation, following the removal of the existing radio base station, the area would be detrimentally affected as the remaining existing sites in the area continue to try to serve a much larger demand, as demonstrated by the coverage plots enclosed. The result would be a loss of coverage, constant buffering and dropped calls to the surrounding area, to the detriment of locals, businesses and visitors to the area.

There is a specific requirement for a replacement radio base station at this location following the planned removal of the existing site due to the legal Notice to Quit on the existing site which means it must be removed. This will allow EE and Three to provide replacement 2G, 4G and new 5G mobile digital connectivity to this area of Liversedge, Wakefield and ensure local businesses, the Emergency Services network and nearby residents do not suffer lost connectivity.

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).

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution. New sites are only developed where there are no viable or accessible alternatives or it is the local planning authority's preferred approach. The feasibility of the acquisition, build and maintenance of the site also needs to be taken into account.

In accordance with the above sequential approach, the proposal is to install a replacement radio base station in this location, as no other existing sites/structures are available within the search area (6 below). The following table details the number of sites considered and their reasons for being discounted.

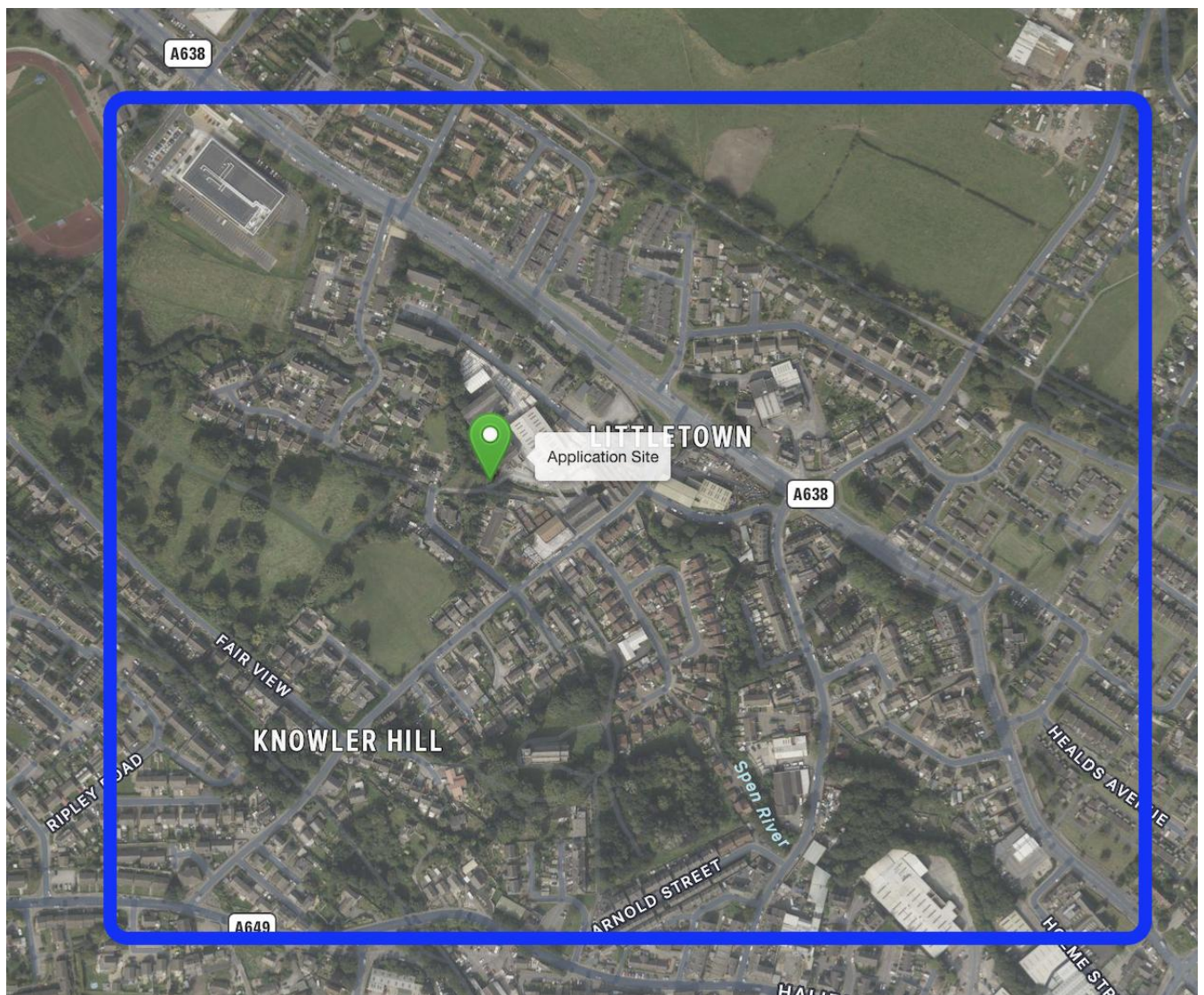


Image 6a: Map of search area

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

Discounted Options	Site Type	NGR	Address and Site name	Reason for discounted Option
Discounted Option 1	Rooftop	E420242, N424249	Victoria Mill, Littletown, Kirklees, WF15 6EE	This is the NTQ site where the operator is currently located. The NTQ has been served on the operators to remove the installation from the site due enable for their planned redevelopment. This site has therefore been discounted.
Discounted Option 2	Rooftop	E420275, N424233	Carr Street, Littletown, Kirklees, WF15 6EE,	This building has a lightweight and pitched roof covering which is not designed to withstand the load that a modern telecoms installation would place on it. This site has therefore been discounted for this reason.
Discounted Option 3	Rooftop	E420476, N424214	Old Oak PH, 349 Bradford Road, Liversedge, Kirklees, WF15 6EW	The small rooftop and historic nature of the property would not lend itself to a RT development that would meet the needs of the cell without it being a large and overbearing development on the building.
Discounted Option 4	Streetworks	E420372, N424199	Knowler Hill, Littletown, Kirklees, WF15 6DX	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
Discounted Option 5	Streetworks	E420266, N424280	Carr Street, Littletown, Kirklees, WF15 6EE	The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.
Discounted Option 6	Greenfield	E420400, N424198	Trident Fork Trucks Limited, Green Road, Littletown, Kirklees, WF15 6DN	A mast at this location is not viable due to a physical lack of space in order to deliver the required level of coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 7	Rooftop	E420278, N424150	CSC Catering, Knowler Hill, Littletown, Kirklees, WF15 6DX	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.

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

Discounted Option 8	Rooftop	E420315, N424173	Bear Cricket, Knowler Hill, Littletown, Kirklees, WF15 6DX	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
Discounted Option 9	Greenfield	E420342, N424259	Littletown Londis, 244-246, Bradford Road, Liversedge, Kirklees, WF15 6EF	Locating the new column and cabinets in the car park of the Church would reduce the overall parking provision which is in constant demand throughout the day. Any reduction in overall car parking spaces would detrimentally affect the daily operations of the Church. As such, this location has been discounted.
Discounted Option 10	Greenfield	E420191, N424071	Knowler Hill, Littletown, Kirklees, WF15 6DX	An installation at this location is considered to be too exposed and surrounded by residential properties, and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 11	Rooftop	E420288, N423985	Christ Church, Church Lane, Liversedge, Kirklees, WF15 6DS	An installation at this location would be within the setting of a Listed building and development within this sensitive area should be avoided and other locations are considered to be more appropriate to deliver the required level of coverage to the target area.
Discounted Option 12	Rooftop	E420465, N424265	Watson's Bakery, Bradford Road, Liversedge, Kirklees, WF15 6EW	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.
Discounted Option 13	Streetworks	E420374, N424247	Littletown Londis, 244-246, Bradford Road, Liversedge, Kirklees, WF15 6EF	An installation at this location is considered to be too prominent in the streetscene and other alternatives exist which are more appropriate in order to deliver the required coverage to the target area. This site has therefore been discounted for this reason.

Discounted Option 14	Streetworks	E420253, N424341	Bradford Road, Littletown, Kirklees, WF15 6LP	The sloping terrain at this location makes it unsuitable for a telecoms installation. This site has therefore been discounted for this reason.
Discounted Option 15	Greenfield	E420110, N424206	Radulf Gardens, Liversedge, Kirklees, WF15 6AT	A mast at this location would not provide the required level of coverage to the target area due the substantial tree cover that would inhibit the signal and would not deliver the required coverage to the target area. This site has therefore been discounted for this reason.
Discounted Option 16	Rooftop	E420189, N424309	Carr Street, Littletown, Kirklees, WF15 6EE	Due to the construction of the building there is no design available to support the operator's apparatus and provide the necessary coverage to the target coverage area.

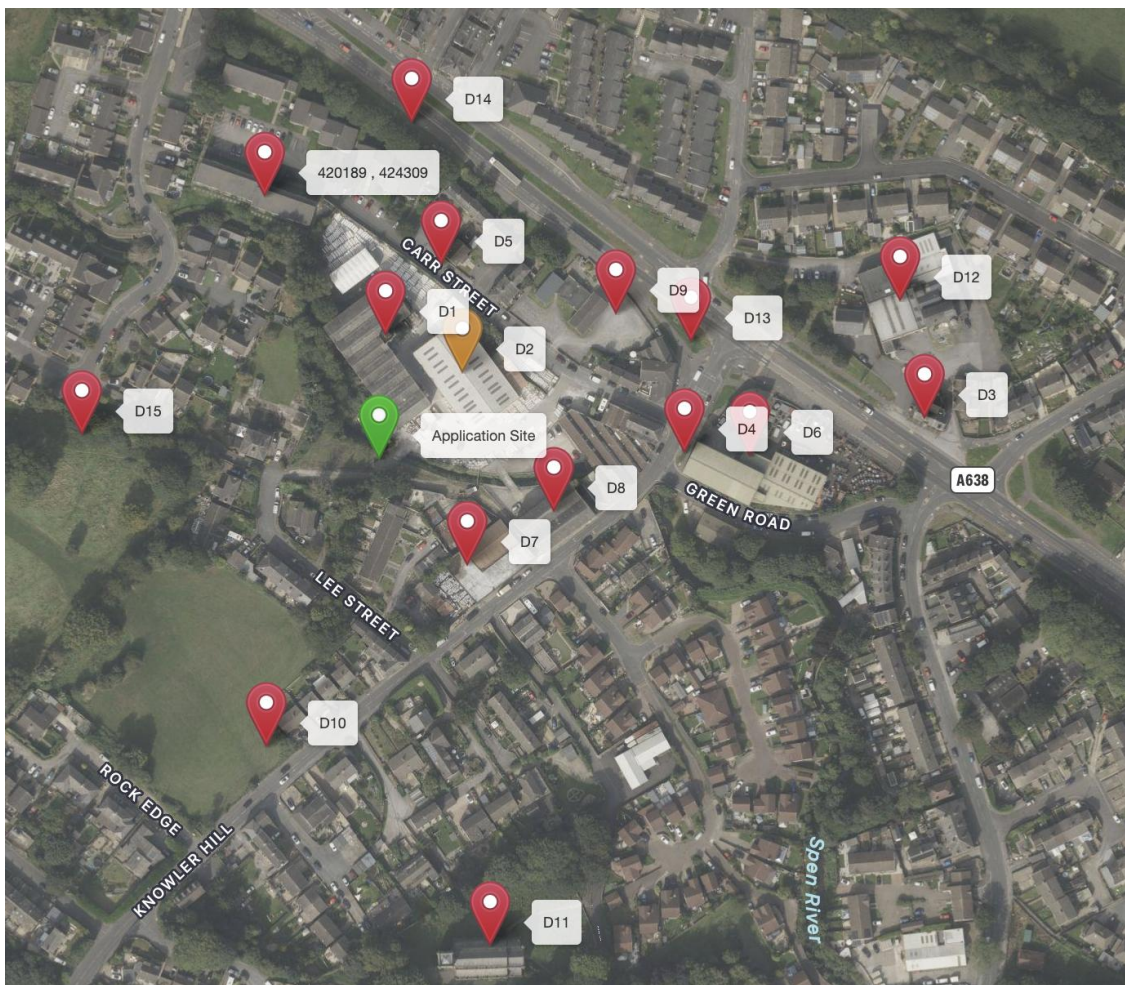


Image 6b: Map of discounted options (Source: Grid Reference Finder)

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

[https://gridreferencefinder.com/#gr=SE2023924196|Application s Site s |1,SE2027524233|D2 |1,SE2024224249|D1 |1,SE2047624214|D3 |1,SE2037224199|D4 s |1,SE2026624280|D5 s |1,SE2040024198|D6 |1,SE2027824150|D7 s |1,SE2031524173|D8 s |1,SE2034224259|D9 s |1,SE2019124071|D10 s |1,SE2028823985|D11 |1,SE2046524265|D12 |1,SE2037424247|D13 s |1,SE2025324341|D14 s |1,SE2011024206|D15 s |1,SE2018924309|420189 s c s 424309|1](https://gridreferencefinder.com/#gr=SE2023924196|Application%20Site%20s%20|1,SE2027524233|D2%20|1,SE2024224249|D1%20|1,SE2047624214|D3%20|1,SE2037224199|D4%20s%20|1,SE2026624280|D5%20s%20|1,SE2040024198|D6%20|1,SE2027824150|D7%20s%20|1,SE2031524173|D8%20s%20|1,SE2034224259|D9%20s%20|1,SE2019124071|D10%20s%20|1,SE2028823985|D11%20|1,SE2046524265|D12%20|1,SE2037424247|D13%20s%20|1,SE2025324341|D14%20s%20|1,SE2011024206|D15%20s%20|1,SE2018924309|420189%20s%20c%20s%20424309|1)

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

N/A

Land use planning designations:

None identified at the time of making the application.

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. The NPPF is pro – development with a 'presumption in favour of sustainable development' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

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

National Planning Policy Framework (December 2024)

The Government's National Planning Policy Framework (NPPF) was published on 24 July 2018 and updates the 2012 version. In February 2019 the NPPF was revised again, with minor alterations to wording relating to housing supply and not any parts relating to telecommunications. The NPPF was updated in July 2021, in order to strengthen sections including requirements on improved design quality, a new requirement for Councils to produce local design codes or guides, an emphasis on using trees in new developments, revised policies on plan-making, removing statues and opting out of PD rights relating to residential conversions. It was most recently updated again in December 2023, in relation to a number of themes including; flexibility for planning authorities in local housing need, clarification of Green Belt boundary alterations and acceptable brownfield development within the Green Belt. It strengthens the importance of building 'beautifully' and respecting the character of an area. It removes the need for annual five-year land supply updates, and protects neighbourhood plans from speculative development for five years. Also, the update encourages community-led and self-build developments and further protects agricultural

land in its availability for food production. In December 2024, a further update took place, reversing a number of the previous revisions from December 2023. The update does not change any parts relating specifically to telecommunications development, other than the paragraph numbers.

Section 6 of the NPPF relates to Building a Strong and Competitive Economy and states at Para. 85 *'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 into 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, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential'.*

Para. 86 states that Planning policies should (inter-alia):

c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;

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 119 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 119. 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 supports the expansion of telecommunications:

"Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)..." (para. 119).

Paragraph 120 of the NPPF sets out the requirement to minimise the number of installations consistent with the efficient operation of the network and also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion.

Paragraph 123 of the NPPF retains guidance from a previous NPPF version which relates to local planning authorities determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

At the heart of the NPPF is the retained presumption in favour of sustainable development (para 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies within the revised Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the revised Framework taken as a whole.

The NPPF continues to provide guidance on decision-making. At paragraph 39 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" (emphasis added).

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 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"...

Code of Practice for Wireless Network Development in England (March 2022)

The Code of Practice (COP) 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 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 out '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 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)”.

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;
- 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 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.'*

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

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 North Tyneside area comprises:

- Kirklees Local Plan (Adopted 2019)

The Kirklees Local Plan was adopted on 27th February 2019. The Local Plan is now the statutory development plan for Kirklees and supersedes the Kirklees Unitary Development Plan (adopted March 1999). Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

The Vision for Kirklees includes: *'In 2031, Kirklees will be a great place to live, work and invest in, delivered through an integrated approach to housing and employment. Development will have taken place in a sustainable way (balancing economic, social and environmental priorities) and by making efficient and effective use of land and buildings supported by necessary infrastructure and with minimal effect on the environment. Health inequalities will have been reduced, enabling higher standards of health and well-being resulting from improved access to training and job opportunities, a decent and affordable home, access to services and green spaces and opportunities for physical activity and a healthy lifestyle'.*

Paragraph 38 of the NPPF requires Local planning authorities to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.

The maintenance of existing 4G services and the introduction of 5G technologies to the area will demonstrably improve the social and economic condition of the local area, without unduly compromising the environmental context.

Policy PLP 4 relates to 'Providing infrastructure'. The policy states *'The council will work with partners to bring forward the necessary and proportionate essential infrastructure that is required in order to deliver the spatial strategy as set out in the local plan. Where new infrastructure is needed to support new development, the essential infrastructure must be operational no later than the appropriate phase of development for which it is needed. Where new infrastructure is needed, the council will expect phasing plans to be submitted as part of planning applications and where appropriate, will link the construction and occupation of that development to infrastructure provision. New development should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL)'.*

Applications are therefore determined in accordance with NPPF and the Kirklees Local Plan Policy PLP4.

Kirklees Economic Strategy 2019 – 2025

The 'Executive Summary' states: *In Kirklees we're turning a proud industrial heritage into innovation and entrepreneurship. From advanced textiles to turbo technologies, we supply everyone from the Ministry of Defence and aerospace sector to the motorsport industry. Our towns and valleys weave together vibrant, young and dynamic communities with breathtaking Yorkshire landscapes.*

Our focus is on growing an inclusive and productive economy at the heart of the North. We are committed to building local wealth, creating an economy that is: Inclusive: with every person realising their potential, through good jobs, and higher levels of skills, income and wellbeing. Productive: with innovative, outward and forward looking businesses. Higher productivity creates more value per hour worked and can support good jobs and higher incomes.

These two pillars weave together: skills, innovation, investment and the infrastructure needed for growth are the catalyst for driving productivity and also reducing inequality. Good work and good pay contributes to people's health and wellbeing and progressive future focused businesses recognise that how they support their staff and help them to progress also contributes to how they grow their bottom line.'

Priorities of the Economic Strategy:

Priorities	Modern innovative businesses	Skilled and ambitious people	Active Partnerships	Advanced connectivity & infrastructure	Revitalised centres
12 Action Programmes	Raising business ambitions and best practice Innovation uplift Growth and investment in engineering and advanced manufacturing	Aspiration uplift (skills) Integrated health and care workforce development	Anchor institutions network, social value and supply chains	Transpennine upgrade & inclusive growth corridor The Big Build Digital infrastructure	Huddersfield North Kirklees & Dewsbury South Kirklees & rural areas
5 'Big Wins'	Digital Innovation Zone	Integrated care workforce development initiative	Kirklees Anchors Network	Transpennine upgrade & Inclusive growth corridor	Revitalising Huddersfield and Dewsbury

Chapter 3 of the Kirklees Economic Strategy relates to 'Delivering an Inclusive and Productive Kirklees Economy sets out five priorities will help to deliver the vision for an inclusive and productive economy, building on existing foundations and putting Kirklees on a positive, long term trajectory that will deliver tangible change'

Priority 4 states:

4. 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.

Leeds City Region Digital Framework

The 'Vision' states: Leeds City Region will secure and exploit world-class digital infrastructure over the coming 20 years. With its partners in the private and public sectors the City-Region will drive up adoption of new technologies and invest in delivering digital services. Leeds City Region will maximise exploitation of the digital communication technology to boost its economic competitiveness, extend new opportunity and grow the City-Region's economy.

Strategic Priorities to 2030 include: Priority 1: Competitive Digital Infrastructure Objective "Leeds City Region will have world-class digital infrastructure at accessible prices for all its businesses and households. The City-Region will strive to have early access to the quickest and most durable technologies for each of its priority locations and user-groups."

UK Wireless Infrastructure Strategy: April 2023

In April 2023, the UK Government published the 'UK Wireless Infrastructure Strategy'¹, a plan for delivering world-class digital infrastructure which the government identifies as an essential enabler for its 5 priorities of building a better, more secure, more prosperous future for the UK, including growing the economy, and creating better-paid jobs and opportunity right across the country. In her foreword, the Rt Hon Michelle Donelan MP, Secretary of State for Department for Science, Innovation and Technology, provides context for the strategy:

"5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone **5G will drive growth** in the industries of today and tomorrow, including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. **5G can improve our public services**, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.... This is an incredible opportunity; widespread adoption of **5G could see £159 billion in productivity** benefits by 2035".

The Future Telecoms Infrastructure Review, 2018 out the ambition of the Government for the UK to become a world leader in 5G technology and ensuring world class connectivity for all. This ambition was reaffirmed in the 'UK Wireless Infrastructure Strategy', published in April 2023 which states in the Executive Summary:

"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".

The Foreword of the 'UK Wireless Infrastructure Strategy' by Julia Lopez MP 'Minister of State for Department for Science, Innovation and Technology' states inter-alia:

"The more our lives are conducted online, the more access to the internet becomes critical for social and economic opportunity.

This is why delivering world-class digital infrastructure to all Britons is a fundamental mission of this government - and our efforts to build it the modern equivalent in scale and ambition to the Victorians' construction of the railways. Our plan is for every corner of our country to get lightning fast connectivity, not only to give people real choices about where to live and work today but so they will not be left out of future technological revolutions because of poor infrastructure.

It is this sense of purpose that underpins Project Gigabit, our flagship £5 billion programme to reach hard-to-reach communities across the UK with gigabit-capable broadband. It is complemented by a staggering competition now underway between commercial suppliers to supply Britons with great connectivity.

Extraordinary progress is being made on coverage. When I began my role in September 2021, gigabit coverage was just over 50%. Now, it stands at almost 75%. With £1bn of Project Gigabit's funding now available to suppliers, our contracts are not just delivering better internet but skilled jobs everywhere from Blandford to Berwick. By the end of next year, we hope to have every part of our country under contract.

Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that'.

The UK Wireless Strategy states that '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 UK Government in the UK Wireless Infrastructure Strategy' recognises that 'growth in the digital sector is nearly 6 times faster than across the economy as a whole.

Of particular relevance to the application proposal, the Wireless Infrastructure Strategy supports network densification through neutral host providers, such as Freshwave. It states:

"Newly emerging operators including... neutral host providers – have a key role to play in delivering advanced wireless connectivity..."

5G brings with it the need to deploy higher bandwidth services using higher frequency spectrum. This means that mobile base stations will have to be placed closer together, also known as network densification. Neutral host models of deployment (where a third-party deploys network infrastructure and provides access or capacity to multiple providers) will likely have an important role to play in this... They also help to minimise street 'clutter'. Neutral hosts lend themselves in particular to delivering smart city infrastructure, as a connectivity layer which can be shared by a multitude of services and applications..."

The use of public sector assets and land is likely to become increasingly important for the rollout of advanced wireless networks, including neutral host networks, particularly where extra capacity is required for services in high demand areas."

Connected Nations Report 2022

The Connected Nations Report 2022 was published in December 2022. It states:

"5G rollout is expanding. EE, Virgin Media O2, Three and Vodafone have continued to extend their 5G networks across the UK, and we are reporting individual mobile network operator (MNO) coverage for the first time, based on the High to Very High Confidence range which we established in 2021. These ranges cover an increasing probability that the coverage predicted by MNOs will translate into coverage on the ground. As noted above, the level of coverage provided outside of premises by at least one mobile network operator across this range is now at 67-77% (up from 42-57% last year). The coverage provided outside of premises from individual MNOs ranges from 39-58% at High Confidence, with a range of 31-45% at our Very High Confidence level. Though most 5G sites are focused around busy urban areas - providing additional capacity to existing mobile data services - we're now seeing coverage extending into smaller towns and other high footfall locations. The distribution of this investment remains broadly similar to last year, with 86% of sites in England, 8% in Scotland, 4% in Wales and 2% in Northern Ireland".

Connected Nations update: Spring 2023

The Connected Nations update: Spring 2023 report was published in May 2023. This is the first interim update to Ofcom's Connected Nations 2022 report. It is based on mobile coverage

and fixed broadband availability across the UK as of January 2023. The report acknowledges that there has not been a significant increase in coverage since the December 2022 report, but the industry continues to develop its coverage footprint.

"4G: Coverage of 4G mobile networks across the UK has not seen significant changes over the last reporting periods. Around 92% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this area includes nearly all of the premises in the UK. This is expected to rise to 95% by end of 2025 as a result of the SRN.

4G not-spots: The UK has both geographic and road not-spots (that is, areas where good 4G services are not available from any mobile operator). Geographic not-spots have remained the same since our December 2022 report at 8%. Road coverage remains largely the same with just 4% of all roads estimated to be an in-vehicle not-spot. This varies significantly across individual nations, particularly in Scotland and also in Wales. Wales has benefited by a percentage point drop in geographic notspots since our December report, which we attribute to the SRN scheme.

Calls and text coverage: As with 4G, predicted coverage for calls and text services remains largely unchanged over the previous reporting periods. The range of predicted coverage by MNOs varies from 85-93% of the UK landmass, depending upon operator. In addition, 99% of all UK premises are predicted to have coverage for outdoor voice calls from all MNOs.

Calls/text not-spots: Areas where people are unable to make a call or send a text from any operator (not-spots) is similarly unchanged, with around 4% of the UK geography estimated as a not-spot, and around 2% of the UK's roads estimated to be a not-spot for calls and texts made or received in vehicle. As with 4G, there are marked variations for individual nations; for example, geographic notspots across Scotland remain higher than for the rest of the UK, at around 10%.

5G: We continue to report on 5G coverage (outdoors premises) from 'All MNOs' and from 'At least one MNO', with coverage confidence levels ranging from high to very high. Coverage from 'At least one MNO' now ranges from 73% (very high confidence) to 82% (high confidence) of premises outdoors, up from 67% and 78% respectively when we reported in our December 2022 report".

Connected Nations update: Summer 2023

The Connected Nations update: Summer 2023 report was published in September 2023, and is the second interim update to the December 2022 annual Connected Nations report. It is based on mobile coverage and fixed broadband availability across the UK as of April and May 2023.

The report found that mobile coverage remains stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. 5G coverage continues to edge forward steadily, with 85% of premises being able to get a 5G signal outdoors from at least one mobile network operator. However, the statistics for outdoor

coverage on 5G networks from all operators are still very low – in England, only 14-24% of premises benefitted from outdoor 5G coverage from all operators as of April 2023.

5G coverage

Premises (outdoor) covered by at least one operator	May 2022	September 2022	January 2023	April 2023
UK	54-69%	67-78%	73-82%	76-85%
England	56-72%	70-81%	76-85%	79-88%
Northern Ireland	26-34%	37-44%	48-55%	54-60%
Scotland	48-61%	57-68%	62-73%	66-76%
Wales	35-48%	46-58%	49-61%	53-65%

Premises (outdoor) covered by all operators	May 2022	September 2022	January 2023	April 2023
UK	5-13%	11-20%	12-22%	12-22%
England	5-14%	12-22%	13-23%	14-24%
Northern Ireland	2-7%	4-8%	5-12%	5-12%
Scotland	3-10%	6-15%	7-17%	8-19%
Wales	2-6%	4-7%	5-8%	4-8%

Image 7: 5G coverage statistics (Source: Connected Nations update: Summer 2023 report)

The report also states:

"The UK Government targets for mobile include a target of 95% UK geographic coverage for 4G, and in April 2023 it published the Wireless Infrastructure Strategy where it announced a new ambition for the UK to have nationwide coverage of standalone 5G to all populated areas by 2030."

Connected Nations Update: Spring 2024

The Spring 2024 update of the Connected Nations report has found that mobile coverage has remained stable for 4G, with around 93% of the UK landmass predicted to have good outdoor 4G coverage from at least one operator. This area includes nearly all the premises in the UK.

For 5G, this has also remained steady, with around 92% of premises being able to get a 5G signal outdoors from at least one mobile network operator.

The Spring 2024 update introduces an interactive report with both the latest and historical data available. This report shows that in North Tyneside, 44% of the geographical area does not have 5G coverage for all mobile network operators. Only 31% of the geographical area has very high confidence 5G coverage by all 4 main operators.

It is therefore clear that the proposed infrastructure is needed to ensure that local residents and businesses in Wakefield have access to the latest 5G services, and that they have a choice for which network to choose for mobile services.

Online Nation 2022 Report

The 'Online Nation 2022 Report' produced by Ofcom confirms the following:

- UK adults spend almost 4 hours a day online, 3 hours of which are spent on smartphones. (UK young adults (i.e., 18-24 year olds spend approximately 5 hours online and UK adults aged 55+ spend approximately 3 hours online)
- 73% of time spent online/day by UK adults was via a smartphone
- 1 in 5 people use only a smart phone for online access compared with 1 in 10 in 2020

With regards to increased usage of smartphones only for online access the report suggests:

"More people are using only a smartphone to go online. People were more likely in 2021 than in 2020 to only use a smartphone to go online (21% vs 11% in 2020)^[2]. There could be many reasons, but this may be because people were spending more time at home in late 2020 and early 2021 than in late 2021, and therefore used a wider range of devices. It may also reflect the larger screen size and better-optimised app functions of many smartphones, making them easier and potentially more cost-effective to use as a sole device for accessing the internet.

The Report goes on to states that:

"In September 2021 73% of the time spent online by UK online adults per day was on a smartphone. UK online adults are also spending slightly more time using tablets than computers, demonstrating that there is a clear preference for using mobile devices to go online. Those aged 25 to 34 spend the highest proportion (85%) of their online time using a smartphone, followed by 35-44s (80%); 15-24s (78%); 45-54s (74%) and those aged 55+ (55%).^[3]"

Therefore, without the improved network coverage and capacity that the proposed essential infrastructure will bring, EE and Three's network users living, working and travelling in the local area, and those of the associated MVNOs and the Emergency Services Network, will not benefit from reliable mobile digital connectivity when using their smartphones for business, education and personal purposes.

The current proposals will facilitate the development of an advanced broadband telecommunications infrastructure in line with National Government guidance contained

^[2] Ofcom Adults' Media Literacy Tracker 2021: Core survey IN1. Which of these devices do you use to go online? (single coded)
Base: All adults aged 16+ who go online at home or elsewhere (excluding those who did not give a response at the postal survey)
– 3,577

^[3] Ipsos, Ipsos iris Online Audience Measurement Service, 1 September–30 September 2021, adults age: 15+, UK. Note: Custom data supplied by Ipsos.

within the NPPF which supports infrastructure especially where growth takes place. Maximising access and maintaining choice in telecommunications should will people to maintain and enhance economic, social and civic connections. Universal accessibility to telecommunications is vital to help overcome isolation or exclusion of urban life. Accelerating the extension of new communications modes should help to avoid new pockets of exclusion developing.

Further to the Government's commitment to improve digital connectivity, on 04th April 2022 the new permitted development rights for telecommunication operators came into force (SI 2022 No.278). The Explanatory Memorandum to the Town and Country Planning (General Permitted Development) (England)(Amendment) Order 2022 confirms that '*permitted development rights have an important role to play in the planning system. They provide a more streamlined planning process with greater planning certainty, while at the same time allowing the local consideration of key planning matters through a light-touch prior approval process*'.

DSIT Letter 'Supporting digital infrastructure deployment in your local area'

The Government recognise that fast and reliable digital connectivity is increasingly important to our way of life. The support from Government was clarified in a letter sent to Council Leaders and Council Chief Executives across the UK, on the 29 November 2024, by Sir Chris Bryant MP in support of digital infrastructure deployment.

The letter, entitled 'Supporting digital infrastructure deployment in your local area', confirms the importance of fast and reliable connectivity to our everyday life, as people increasingly rely on their devices to work, learn and stay connected with each other, demand for greater speeds and more reliable connectivity is growing. Better digital connectivity is also key to delivering faster economic growth and increasing social inclusion. The Government is commitment to supporting the delivery of next- generation connectivity across the UK by driving towards nationwide 5G coverage by 2030. The letter requests help from Councils across the UK to achieve these goals by prioritising digital infrastructure and focussing on a number of areas that remain a challenge to telecoms investment.

'Keir Starmer in the Times: We will launch a golden era of building'

"Every road, pylon and mast — which connect people with opportunity — must jump through endless hoops, only to be opposed, dragged out, before eventually, if lucky, approved".

Good connectivity allows people to access a wide range of essential services and a further explanation on some of these key benefits is provided below:

Economic benefits

- Creating more productive and cost efficiencies for businesses
- Businesses offering online services can extend their products to a broader audience

- Local areas and businesses can benefit from tourists and visitors as hotels, attractions, and restaurants can be booked online from anywhere in the world
- Business owners and services like doctors can provide a faster and more cost-effective service by offering both online appointments and ordering
- Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote
- 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 facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.

Social benefit

- Mobile communications can help people to stay in touch wherever and whenever, which can help improve social wellbeing
- Convenient access to online commerce or businesses
- Contacting emergency services is easier, especially in remote areas
- Giving the ability to manage our personal finances and information 24/7
- Using a mobile wherever you go can provide better personal security
- Having access to social networking sites and applications can keep people entertained with their lifestyles and interests
- Access to real-time transport information or timetables
- Smart meter reads for utilities such as gas or electric
- Contacting local authorities
- Promotion of smarter and productive ways of working. For example, working from home can help minimise commuting which can provide better work and home life balance

Sustainability and Environmental benefits

- Facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions.
- Better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids.
- 5G infrastructure requires fewer heat generating electronic components.

- 5G enabling of the Internet of Things (IOT) sensor deployment can manage and alert us to pollution risks, health hazards and flood risk.
- Provision of smart technologies within the agricultural sector will facilitate more efficient and less wasteful practices helping to limit negative impacts.
- 5G networks allow monitoring of traffic flow resulting in less congestion and better air quality. They also make driverless cars possible; a means of transport that offers better fuel efficiency.
- Smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.

Health benefits

- 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.
- Patients across the country are now becoming accustomed to using remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies.
- 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.

Education benefits

- Facilitates access to educational establishment databases or booking systems for securing places for the likes of school dinners, field trips, extra-curricular activities, student/teacher reviews, etc.
- Provides access to school/college/university apps for setting and submitting homework/coursework, ensuring news and notifications are delivered efficiently, and for parent/student/teacher interactions.

Planning Issues

The main issues arising from this prior approval notification are whether the proposed replacement mast and cabinets, due to their siting and appearance, would result in harm

and, if so, whether any perceived harm would be outweighed by the significant social and economic benefits associated with the replacement and improvement of existing service and introduction of 5G provision attributed to the proposal to enable sustainable development and growth across the district and meeting the needs of its communities and the Emergency Services.

The provisions of the GPDO require the local planning authority to assess the proposed development solely on its **siting and appearance**.

Principle of Development

The proposed replacement site fully complies with the NPPF and the Local Plan, as it will maintain and enhance overall connectivity for this area of Liversedge for EE, Three and the ESN, whilst also introducing new 5G services. Access to high quality, reliable superfast mobile network is not just a 'nice to have' but an essential part of everyday life. Indeed many, including the former Minister for Digital Infrastructure Matt Warman, consider it to be the fourth utility service as important as gas, water and electricity, a life line for many especially during the COVID 19 pandemic where people were able to see their loved ones, speak to friends and family and arrange virtual meetings allowing some form of normality in a very abnormal situation.

The principle of development has been established by the Government when the new permitted development rights came into force in November 2016 and again in April 2022, which enables sites such as this one to be built, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

Planning Practice Guidance explains how a prior approval application differs from a planning application at paragraph 28. It states that:

'The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established (emphasis added). Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion on what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system' (emphasis added).

The Planning Portal also provides Application Type Guidance. This guidance states that:

'Certain forms of telecommunication development, for example, mobile telephone masts, are known as 'permitted development' and subject to prior approval from the local planning authority. The prior approval procedure means that the principle of development is not an issue. The LPA can only consider the siting and appearance of the proposal'.

Siting

The siting of the proposed radio base station has been carefully considered. The proposed application site is approx. 50m to the south of the NTQ and is sited to the west of the A638. The application site relates to a vacant parcel of land which is enclosed with a fence. The land is privately owned and set off an unadopted road, the site is somewhat secluded for this reason. The site is set 32m away from the eastern side of dwellings to the west, and 24m away from the northern side elevation of dwelling to the south east and south west.

As explained throughout this statement, the siting of the equipment has predominantly been guided by technical restrictions. The existing site, located atop of Victoria Mill must be removed following a Notice to Quit and as such a replacement must be identified.

As previously stated, prior approval for the siting of a slimline 25m high lattice mast under LPA Ref: 2021/N/94739/E was approved in 2022 (See Image 2 above). The operators demand has now changed which has resulted in a change of design hence this re-submission for a 25m monopole in the same location. The proposals replace those granted under LPA Ref: 2021/N/94739/E.

The replacement tower will also be capable of hosting upgraded antennas for multiple operators which will allow for enhanced capacity on the 2G and 4G networks, as well as the ESN and new 5G service provision, to be provided to the area.

In line with the requirements of NPPF, there are no existing telecommunications installations for the operator to share that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate their equipment. The discounted options are set out above and their reasons for being discounted are fully explained.

Therefore, a replacement installation in the proposed location will prevent this loss of services to the residents, business and visitors to the area, and will ensure the provision of enhanced coverage and capacity to the surrounding local area for EE, Three and the Emergency Services Network.

Appearance

Freshwave have carefully considered the design of the proposed mast. The structure has been designed to be able to support the equipment for additional operators. A monopole mast is the most suitable design from a technical viewpoint, such a design is also able to facilitate greater coverage and provide the structural capability required to be able to support the weight and size of all the operator's telecommunications equipment. Due to the technologies that will be available from multiple operators at this location (2G, 4G and 5G services) 9 no. antennas need to be installed on two headframes at the top of the monopole tower. If the monopole were to be any slimmer in width, then it would not be structurally capable of supporting all the operators equipment or meet windloading requirements.

A streetworks style column cannot be utilised as they are not able to structurally support the weight and size of the MNO's equipment to enable the operators to share the same structure. A number of masts would be needed, throughout the local area. This would lead to proliferation and would have a much greater impact on the surrounding area. Such designs are also restrictive on the coverage that can be provided due to limitations in respect of the heights and bearings and therefore will not be able to provide the necessary coverage to the target coverage area. The more compromises on design, the less coverage and service provision that can be provided and the less benefits will be obtained.

The proposed height at 25 metres is essential to provide all the operator's equipment to reach the target coverage area. Given the whole of the antenna needs to be clear from obstruction, then if the mast were to be any lower in height, then it would not be able to clear the buildings and natural form including mature vegetation and reach the target coverage area. This would fail the operators design brief to provide high quality coverage in this area of Liversedge and surrounding area of Wakefield.

Remote Radio Units (RRUs) are proposed underneath the antennas. These are small, approximately the size of a shoe box. They are designed to make the antennas more efficient and reduce the amount of ground based equipment cabinets, thus minimising the visual impact on the surrounding area. Given their height above ground level located underneath the antennas, they will not be prominent in the streetscene.

The proposed equipment cabinets are small for telecommunications apparatus and proposed to be coloured grey. They will be enclosed within a chain link fenced compound and will not be overly noticeable outside of the site given the siting.

The site will be located within a fenced compound for health and safety reasons. The fence will provide screening for the proposed equipment cabinets and other ancillary ground based equipment, as well as the lower part of the tower.

The operator is proposing to install a structure which will be capable of delivering high quality replacement 2G and 4G services as well as new 5G services provision to the surrounding area for EE and Three and other MNOs.

It is therefore considered that the proposal before you strikes a good balance between environmental impact and operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site. Taking all matters into account it is considered that this proposal, to provide replacement 2G, 4G and the latest 5G service provision, delivering the capability required from a single network installation, would not appear out of place within the street scene. This is in line with the requirements of NPPF which supports equipment which is sympathetically designed [paragraph 120], as well as policy PLP 4 of the Local Plan.

Lack of Coverage – Material Consideration

The proposed installation is significant to enable continuous coverage of the telecommunication network, ensuring that this area of Liversedge, Wakefield continues to get the mobile coverage it needs. 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.

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.

Without this radio base station, following the removal of the existing site, the operator's customers would experience increasing numbers of dropped calls and buffering, leaving them unable to access the internet on their handheld devices.

The proposed radio base station is in full conformity with the NPPF and the Local Plan, in that the equipment will improve mobile telecommunications connectivity in the area, and it is sited and designed to minimise impacts upon the environment. The proposals will promote the enhanced connectivity of the area, by providing infrastructure for high speed telecommunications. Indeed, high quality telecommunications is often seen as the fourth utility service. It will support the Local Plan vision of ensuring that local residents and businesses are *"supported by a high quality, high capacity digital infrastructure network"*.

The proposed installation will help improve the area's economic prosperity, 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. 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.

Economic and Social Benefits

The NPPF strongly supports sustainable development, as does the Local Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, participate in social media, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. Residents and businesses will enjoy better accessibility, assisting home-base working by improving the electronic means of communication and the roll-out of high-speed broadband helping to promote live-work development. This reduces travel time, carbon emissions and increases

the speed in which information is processed/shared. The proposals therefore fully comply with NPPF, Leeds City Region Digital Framework and the Kirklees Economic Strategy.

In such instances, as described above, the NPPF supports development that improves the economic, social and environmental conditions in the area. Maintaining and enhancing the 2G and 4G coverage and capacity in this area, the ESN, and providing 5G services will fully meet this national policy objective.

Mobile connectivity is essential to the future success of the economy. 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.

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 39 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'.

The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with a 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.'

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.

Further to the Government's commitment to improve connectivity, new permitted development rights have come into force for telecommunication operators, designed to lift the restrictions on mobile operators such is the significance and weight the Government place upon the benefits attached to modern connectivity.

A National Needs Assessment – A Vision for UK Infrastructure was also published in October 2016. 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 and 4G coverage and capacity and introducing 5G connectivity in Wakefield, 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 provide a radio base station in Liversedge to provide 2G and 4G as well as new 5G services, and ESN coverage is significant.

The proposed installation in this location will allow the operator to provide replacement and improved high quality 2G and 4G coverage and capacity as well as new 5G service provision and ESN coverage. This fully meets the aspirations of the NPPF and the Kirklees Local Plan, as well as the Kirklees Economic Strategy and the Leeds City Region Digital Strategy, which all

acknowledge that telecommunications development is crucial to sustainable development and economic growth, provided it is sited and designed to minimise impacts upon the environment.

There have been numerous appeal decisions where the Inspector has attached significant weight to the benefits, alternative options, technical constraints and NPPF in a balancing exercise of all the valid material considerations, including visual impacts.

The issue of benefits and a planning balance was also considered in Appeal Ref: APP/L1765/W/18/3197522 Land at junction of Andover Road and Athelstan Road, Winchester. The proposal related to the installation of a 17.5m street works pole and associated equipment cabinet at land at the junction of Andover Road and Athelstan Road, Winchester.

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high-quality communications. The National Planning Policy Framework (the Framework) at Paragraph 112 states, "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". In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be 'adequate' without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision'*.

In March 2020, the decision of Birmingham City Council to refuse planning permission for a proposed telecommunications upgrade was overturned by the Planning Inspectorate (APP/P4605/W/19/324191). Within the decision notice, the Inspector stated:

'In this case, the proposed development would result in harm to the visual amenity of the area, with particular regard to the proposal's scale and siting. As such, conflict would arise with Policy PG3 of the Birmingham Development Plan insofar as the development would not reinforce local distinctiveness with a design that responds to site's conditions and the context of the local area. However, I conclude that this harm would, on balance, be outweighed by the economic and social benefits that would stem from the proposed upgrade which would not be realised whilst reducing the height of the mast. Therefore, in the round, the proposal would accord with saved UDP Policies 8.55 and 8.55A-C, the SPD and Framework paragraphs 112 and 113. Collectively, these seek to support the expansion of shared next generation mobile technology to create a modern, high quality and reliable communications infrastructure that is essential for economic growth and the life of the local community'.

Summary

Freshwave is in the process of progressing a suitable replacement site in the Liversedge, Wakefield area for a radio base station to ensure reliable mobile digital connectivity is

maintained for residents, businesses and visitors. As part of EE and Three's continued network improvement program, there is a specific requirement for a replacement installation at this location to provide equivalent and improved 2G and 4G coverage and capacity, ESN coverage, as well as new 5G ensuring that this area of Liversedge, Wakefield maintains access to the latest technologies. This follows the urgent need for the operator to remove the existing rooftop installation at Victoria Mill.

The proposed height at 25m is essential in order for the antennas to be able to reach the target coverage area, to maintain and provide high quality 2G and 4G capacity and new 5G service provision to the surrounding area. This will fully meet the national Governments aim of '*ensuring that everyone is connected to the information superhighway*' and the national policies set out in the NPPF.

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.

The social and economic benefits of providing continued reliable and high quality mobile broadband connections including 5G support sustainable growth meeting the needs of the population and strengthening global competitiveness. This is fully supported by the NPPF, UK Wireless Infrastructure Strategy, the Kirklees Plan and the Leeds City Region Digital Framework. These benefits are strong material considerations which outweigh any perceived loss of visual amenity to the surrounding area.

We confirm that submitted drawings have been checked for accuracy.

Name: (Agent)	<u>Dianne Perry MRTPI</u>	Telephone:	<u>Redacted</u>
Company:	<u>Perry Williams</u>		
Company Address:	<u>Dunkirk Avenue</u> <u>Desborough</u> <u>Northants</u> <u>NN14 6DE</u>	Email Address:	<u>Redacted</u>
Signed:	<u>D Perry</u>	Date:	<u>16/04/2025</u>
Position:	<u>Director</u>	(on behalf of Freshwave)	<u></u>