

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Blackmoorfoot Road	Site Address:	Blackmoorfoot Road Crosland Hill Huddersfield West Yorkshire HD4 5NF
NGR:	E: 411824 N: 414742		
Site Ref Number:	NTQ 38714	Site Type: Macro	NTQ Replacement

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	15/07/2025
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber
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Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.

Summary of outcome/Main issues raised:

No responses had been received at the time of submission.

School/College

Location of site in relation to school/college:

There are no schools in close proximity to the site.

Outline of consultation carried out with school/college:

N/A

Summary of outcome/Main issues raised:

N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?		Yes
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Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
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Details of response:

Thanks, that is well out of range so should be ok. Aviation frequencies range from 118-137 MHz. Thanks for getting back to me

No objections or observations from YAA.

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
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Date served:	20 th July 2025
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3. Proposed Development

The proposed site:

It is imperative to consider that this proposal is to replace an existing installation and is not a new additional installation. The need for this mast stems from MBNL having been issued with an NTQ (Notice to Quit) on their existing site and thus this new mast is urgently required to maintain coverage. The current mast was located on a piece of land that the existing landlord

wanted to redevelop and thus a new site is needed to replace this.

This planning statement has been prepared in support of an application for the replacement of a NTQ 20-metre monopole. The proposed site is at Blackmoorfoot Road, Crosland Hill, Huddersfield, West Yorkshire, HD4 5NF. The proposal seeks to provide a replacement telecommunication facility, ensuring improved mobile network coverage for the surrounding area in line with evolving technological needs. The proposal aims to replace mobile network coverage and capacity in the area, aligning with national and local policies that support the development of telecommunications infrastructure.

The proposed site is located on the pavement at Blackmoorfoot Road, Crosland Hill, Huddersfield, West Yorkshire, HD4 5NF and can be seen below in figures 1-3.

The proposal is for the installation of a new 20m monopole and associated antennas that will provide continued and improved coverage for EE, H3G LTE and ESN for this area of Huddersfield when the existing site is decommissioned. The proposed new facility will require the installation of a limited number of equipment cabinet housing radio equipment at ground level and in close proximity to the base of the pole.

The proposed site is located close to the junction of Blackmoorfoot Road and Crosland Hill Road. The proposed site has rough ground immediately behind it which has a caravan storage area beside it. Opposite the site is largely commercial with open areas beyond. The nearest residential properties are on Crosland Hill Road and are predominantly side-on to the proposed mast. The proposed site has an established tree close to the corner of Crosland Hill Road, which will afford a degree of screening; the nearest house on Crosland Hill Road has established trees in the front garden helping to screen the proposed site, with the front windows overlooking the rough ground.

As previously stated, this is not a new additional installation but is a replacement for an existing installation that is to be removed. The proposed installation is necessary for the continued and improved wireless connectivity and capacity for local businesses, residents and visitors to this busy area of Huddersfield.

Figure1



Figure 2



Figure 3



Site Ref:	38714	Site Address:	Blackmoorfoot Road, Crosland, Huddersfield, HD4 5NF
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Local Planning Authority: Kirklees Council

Development Plan: Kirklees Local Plan Strategy and Policies (2019)

Fig.1: LP Plan Extract (Reference Only):



Site and its surrounds

Policy Relevant to the Development Site:

The site is designated as being within the settlement boundary, with urban uses to the north,

east, south, and west. The site designation is not a material consideration.

Kirklees Council does not have a specific telecoms policy, although policy LP10 is relevant to consideration. This, together with the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Policy LP10 reads:

“Supporting the rural economy

1. The economic performance of the rural economy will be improved by:
 - a. supporting the rural digital economy.”

In addition to the above, Paragraph 119 of the NPPF (2024) 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. 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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

The LPA should look to support this proposal as the equipment will bring “reliable communications” to the area.

Paragraph 122 states that

- c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

The discounted options section of this planning statement fully illustrates that all other potential masts, roof tops and other locations have been investigated. The proposed site is the optimum location from a planning and coverage perspective.

The proposed development at this site is required to deliver the requisite level of electronic communication service on a single site that is to be adapted to accommodate multiple users (so enable future site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location (the location being away from sensitive users / utilising adjacent boundary treatment to screen ground-based equipment). The form and design of the proposed configuration would not appear out of context in this location (being seen as an installation of comparable design and height to others in similar locations), so according with wider Development Plan policy, and would ensure the integrity, character and setting of the area is maintained.

The public benefits of a greatly enhanced communications network for businesses, residents and visitors alike in this location would qualify as a substantial benefit with near benign change

or impact on amenity or on the character.

The enhanced digital service would very much accord with the objectives of the Development Plan policy, with any perceived harm to amenity being materially outweighed by the demonstrable public benefits the scheme would provide.

The proposal fully accords with the requirements of the NPPF.

RADIO PLANNING AND PROPAGATION

When planning cellular telecommunications networks it is important for engineers to predict, with a high degree of confidence, the behaviour of cellular transmissions. This then enables the operator to calculate how many cell sites are needed to provide the level of coverage required by the services they offer under the terms of their licence.

The strength of radio signals detected at a receiving device naturally reduces the further away it is from the transmitter. In general the reduction (or decay) in signal power is affected by a number of variables. The main factors are

- frequency,
- distance (from transmitter),
- terrain (such as hills),
- clutter (such as buildings, foliage, vehicles, and water)
- and atmospheric conditions (such as rain).

A reduction in the strength of the radio signal increases the likelihood of dropped calls and reduced data rates for internet browsing, for example.

Clutter

Any physical object obstructing the propagation of radio signals causes a reduction in signal strength reaching a customer's device. A common term for these objects is 'clutter'. The more obvious examples are buildings and geographical terrain such as hills and trees.

Buildings cause a varying amount of signal reduction depending on their height, construction, thickness of walls, amount of windows etc. Glass causes a lower reduction in signal than brick/concrete walls.

Customers will inadvertently be aware of this by finding that sometimes they need to go near windows, a higher floor of a building or even outside in order to achieve a stronger signal for their mobile devices.

Tree Clutter

The effects of trees on signal degradation should never be underestimated. Signal absorption and shadowing effects vary according to vegetation and density, and are caused by the main tree trunk, branches and leaves.

Cell sites located in or near trees will have signals significantly reduced. As a result a number of extra sites may need to be built locally in order to counter-effect this.

Signal variation throughout the seasons is also a practical concern. Leaves on trees in the

spring and summer can cause shadowing and reduce radio voice quality and increase the number of dropped calls.

As a result the bottom of an antenna should be a) above the top level of the trees, b) allow greater height due to the antenna downtilt at build or for future requirements and c) allow some room for future growth of the trees.

In the case where the cell site utilises point-to-point microwave backhaul transmission the microwave dish should not be obscured at all.

Propagation Models

In essence these are mathematical formulae used to characterise radio wave propagation, in order to determine the received signal strength at a receiving device.

The most well-known propagation model used for mobile telecommunications is 'Okamura-Hata'. More specific studies have been performed to investigate specific clutter and terrain such as dense-urban and urban environments. Resulting from these are propagation models for specific clutter types.

Coverage Planning Tools

Radio planning engineers plan cellular networks using highly sophisticated computer programs that incorporate the above propagation models. Armed with data on cell site location, cell site configuration, maps, terrain etc they are used to predict areas of coverage deficiency (so called 'coverage holes'), new site requirements and configurations.

Network Changes

Over time the topography and clutter in an area is subject to change. For example, building developments, housing and tree growth can all change. As a consequence the signals received from local phone masts can degrade, as they are dependent on these factors. These reasons along with customer complaints, network consolidation (mast sharing) and new technologies (4G) require a re-evaluation of a network operator's telecommunications infrastructure.

Mast sharing can result in some masts no longer being needed. As a result they are decommissioned and physically removed.

Technical surveys undertaken for reasons above may highlight that antenna height increases are required – this is more likely for sites with low antenna heights around 15m AGL, particularly street furniture sites. More details on these reasons below.

While thus far this document is generic to mobile telephony masts it should be noted that each mast has to be dealt with on a case-by-case basis.

Site Height increases

There are a number of reasons why an operator may request a height increase on existing structures. The main ones are described below.

Maintaining existing coverage

The antennas inside, for example, street furniture sites are generally of 2 physical build designs – 'Single Stack' and 'Dual Stack'. The former describes when the set of antennas are all at the same height. The latter describes a site with 2 sets of antennas one above the other.



The 'Dual Stack' is by far the preferred option. This is due to a number of factors including greater flexibility & control for different technologies and providing optimum service performance to customers.

Network Consolidation between H3G LTE and EE and new 4G technologies facilitate a Single Stack structure being upgraded to a Dual Stack structure. In a straight swap scenario at equal height the new lower aperture antennas would be lower than they were originally - resulting in significantly reduced coverage. To ensure existing coverage is maintained the whole structure needs to be increased in height.

Clutter changes

A more extreme example is when the local clutter or tree lines have changed, or are such that the mobile signals are blocked, resulting in lower quality calls and downloads for mobile device users. To provide sufficient services to customers height increases on existing masts or additional new masts are required. The former is the preferred option in many cases.

ICNIRP Compliance

The addition of new technologies and mast sharing affects ICNIRP compliance – a higher minimum mast height is required in some cases.

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA upon request.

Type of Structure

Description:

PROPOSED EE/H3G VALMONT 20m HIGH PHASE 7 MK2 STREETWORKS POLE ON
ROOT FOUNDATION
PROPOSED H3G 1No. GPS NODE
PROPOSED EE 1No. GPS NODE
PROPOSED H3G 3No. APERTURES
PROPOSED EE 3No. APERTURES
PROPOSED EE/H3G 3No. SHARED APERTURES
PROPOSED EE/H3G 2No. 300mmØ DISHES
PROPOSED EE/H3G MK5B LINK AC CABINET ON ROOT FOUNDATION
PROPOSED EE UNILATERAL CABINET ON ROOT FOUNDATION
PROPOSED EE WILTSHIRE CABINET ON ROOT FOUNDATION
PROPOSED H3G BOWLER CABINET ON ROOT FOUNDATION
PROPOSED H3G UNILATERAL CABINET ON ROOT FOUNDATION
PROPOSED EE/H3G WRAP-AROUND CABINET
LITTER BIN TO BE RELOCATED

Overall Height: 20 m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	Refer to drawings
Width:	Refer to drawings
Height:	Refer to drawings
Materials	
Tower/mast etc – type of material and external colour:	Refer to drawings
Equipment housing – type of material and external colour:	Refer to drawings

Reasons for choice of design:
The proposed installation is an EE Ltd and H3G LTE Phase 7 MK2 Streetworks Pole which will house both EE and H3G LTE. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 131) of the 2023 National Planning Policy Framework. It states: “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”. In keeping with the National Planning Policy Framework guidelines of using high quality communications infrastructure the proposed monopole design has been selected to minimise visual impact by integrating with the existing street furniture, having similar vertical lines. Being located opposite the commercial properties backing on to Blackmoorfoot Road, one of which already has CTIL telecommunications equipment on its roof. Whilst it is accepted that this proposed installation is tall, physical objects such as the tall surrounding buildings and trees can obstruct radio signals causing a reduction in signal strength and coverage. The height of the proposed monopole is therefore necessary for this installation to enable the continued and improved coverage and capacity to be achieved and delivered to the residents and businesses in the area.

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance the emissions from all mobile phone network operators on the site are taken into account.		

5. Technical Justification

Reason(s) why site required

The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

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The site is required to provide new 5G coverage for EE Ltd in order to improve coverage in the HD4 area of Huddersfield. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

The installation of this replacement telecommunications monopole within this area of Huddersfield, is essential to ensure continued provision and to meet the growing demand for reliable and high-speed communication services. The proposed mast will also enhance mobile network coverage, ensuring that residents have continued and improved access to seamless and efficient communication services. This connectivity is not only crucial for personal communication but also plays a vital role in supporting businesses, education, and emergency services within the community.

6. Site Selection Process – alternative sites considered and not chosen

Discounted Options

In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF) following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always

examined prior to the submission of an application.

Site Type	Site Name and Address	NGR	Reason for not choosing
D1	Land of Thewlis Lane	E: 411858, N: 414681	Small storage yard used to store limestone. Site discounted due to whole yard being used - limited space for equipment.
D2	Signal House	E: 411843, N: 414833	Small car park associated with commercial properties off Blackmoorfoot Road. Site discounted due to limited space for equipment
D3	Land Cromarty Drive	E: 412142, N: 414983	Several fields used for grazing to the East of the search ring. Land falls away significantly so any site here would struggle to provide required coverage
D4	CTIL co/lo	E: 411904, N: 414808	Existing CTIL equipment located on the rooftop of Woodcock & Wilson. There is limited space for additional antenna and cabinets, therefore site discounted
D5	Land off Farmhouse Court	E: 411698, N: 414890	Several fields used for grazing to the North of the Search ring. Site discounted due to proximity to houses with no tree cover
D6	Enkae Prestige Motors	E: 411938, N: 414833	Garage for used cars off Blackmoorfoot Road. Limited space on forecourt for equipment due to cars. Land falls away so any new site would struggle to provide required coverage
D7	G K Autos	E: 411949, N: 414867	Small MOT unit with parking for 2 cars. Site discounted due to limited space for equipment.
D8	Land off Nairn Close	E: 412113, N: 414681	Several fields located to the rear of the Quarry, behind residential. Site discounted due to land falling away so wouldn't provide required coverage



<https://gridreferencefinder.com?gr=SE1185814681|D1|1,SE1184314833|D2|1,SE1214214983|D3|1,SE1190414808|D4|1,SE1169814890|D5|1,SE1193814833|D6|1,SE1194914867|D7|1,SE1211314681|D8|1&v=r&labels=1>

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

N/A

7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for EE Ltd, ESN and H3G LTE to expand their respective 5G telecommunications network across Huddersfield specifically in this instance to enhance 5G coverage levels and network capacity within the HD4 area.

This partnership has resulted in the development and production of an array of “dual user” structures and cabinets, which have the ability to accommodate both operator’s antenna systems and radio equipment.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes, and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law and re-iterated in Section 38 of the Planning and Compulsory Purchase Act 2004, it is stated 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.”

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF December 2024) sets out the Government’s planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including: -

- economic objective – to help build a strong, responsive and competitive economy
- social objective – to support strong, vibrant and healthy communities
- environmental objective – to protect and enhance our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The

paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

NPPF Paragraph 119 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. 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; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”

It continues in Paragraph 120:

“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 123:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure

Conclusion

We consider that the development is compliant with the council’s policy and that in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

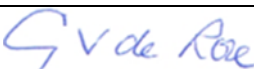


WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley, Leeds LS20 8EY

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Council's Local Plan Policies.

Guy de Rose
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Contact Details

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Signed:		Date:	23 rd July 2025
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	