

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	EIGHTLANDS BANQUET HALL	Site Address:	GRANVILLE STREET, EIGHTLANDS, DEWSBURY, KIRKLEES, WEST YORKSHIRE, WF13 2NF
NGR:	E: 424035 N: 421781		
Site Ref Number:		Site Type: Macro	GF – Macro

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why: N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Written offer of pre-application consultation:	Yes	
Was there pre-application contact:	Yes	
Date of pre-application contact:	15 th September 2025	
Name of contact:		
Summary of outcome/Main issues raised:		
Prior to submission, the applicant engaged in a pre-application enquiry with Kirklees Council. As no response has been received to date, and having reviewed the available information relating to the site, the decision was taken to proceed with the submission.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:			Green
<p>Outline of consultation carried out:</p> <p>Dewsbury East Ward Councillors:</p> <p>eric.firth@kirklees.gov.uk cathy.scott@kirklees.gov.uk paul.moore@kirklees.gov.uk</p> <p>MP: Iqbal Mohamed MP: iqbal.mohamed.mp@parliament.uk</p> <p>Residents at Dawson Gardens Mrs. Andi Gilroy-Sinclair at Flatts Nursery School office.flatts@kirkleeseducation.uk</p>			
<p>Summary of outcome/Main issues raised:</p> <p>No responses have been received to date. We will update in due course if and when any responses are received.</p>			

School/College

<p>Location of site in relation to school/college: Flatts Nursery School</p> <p>Approximately 30m to the north of the site.</p>
<p>Outline of consultation carried out with school/college:</p> <p>Emailed Mrs. Andi Gilroy-Sinclair at office.flatts@kirkleeseducation.uk</p>
<p>Summary of outcome/Main issues raised:</p> <p>No responses have been received to date.</p>

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

Will the structure be within 3km of an aerodrome or airfield?		No
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Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	7 th October 2025	

3. Proposed Development

<p>The proposed site:</p> <p>An existing greenfield installation was previously located at Dewsbury College, Halifax Road, WF13 2BN. This site accommodated a number of mobile network operators, including VM02. However, the landowner served the operator with a Notice to Quit (NTQ), requiring full decommissioning and removal of the telecommunications infrastructure. Consequently, the site is no longer available to operators, and VM02's rights to remain on the land have been terminated. This has created an immediate requirement to identify and secure a suitable alternative location.</p> <p>The images below demonstrate the former installation, which is visible on earlier Google imagery (2023). More recent imagery (2024) confirms the removal of the infrastructure, evidencing the loss of coverage in the locality.</p> 



To avoid a coverage deficit in this high-demand area, there is an urgent requirement for a permanent replacement installation. The proposed site will ensure the continuation of reliable 4G coverage, while also introducing enhanced 5G connectivity to surrounding neighbourhoods and businesses. In identifying a replacement site, proximity to the original location is critical to minimise any adverse impact on existing network performance. Relocating too far from the original installation risks reduced service levels for users within the coverage footprint. The proposed location has therefore been strategically selected to maintain continuity of service and deliver improved 4G and 5G capability across the locality.

The replacement infrastructure is also necessary to accommodate growing demand on the operator's network as increasing numbers of users rely on internet-enabled handheld devices. The removal of the previous installation has created a significant gap in service provision. The new installation will enable VM02 to meet both current and future requirements by hosting 4G and 5G equipment independently, as site-sharing arrangements are no longer viable. Without this provision, users are at risk of experiencing dropped calls, buffering, and overall reduced connectivity.

A detailed site search has been undertaken, assessing a range of options in the area. Following this process, the preferred solution is the development of a 22.5 Phosco pole, supporting six antennas with associated support structures, two equipment cabinets, and ancillary development. The proposed location is at Eight Lands Banquet Hall, Granville Street, Eightlands, Dewsbury, Kirklees, West Yorkshire, WF13 2NF, on a greenfield site. The site is identified in the Location Plan and in Figure 1 below.

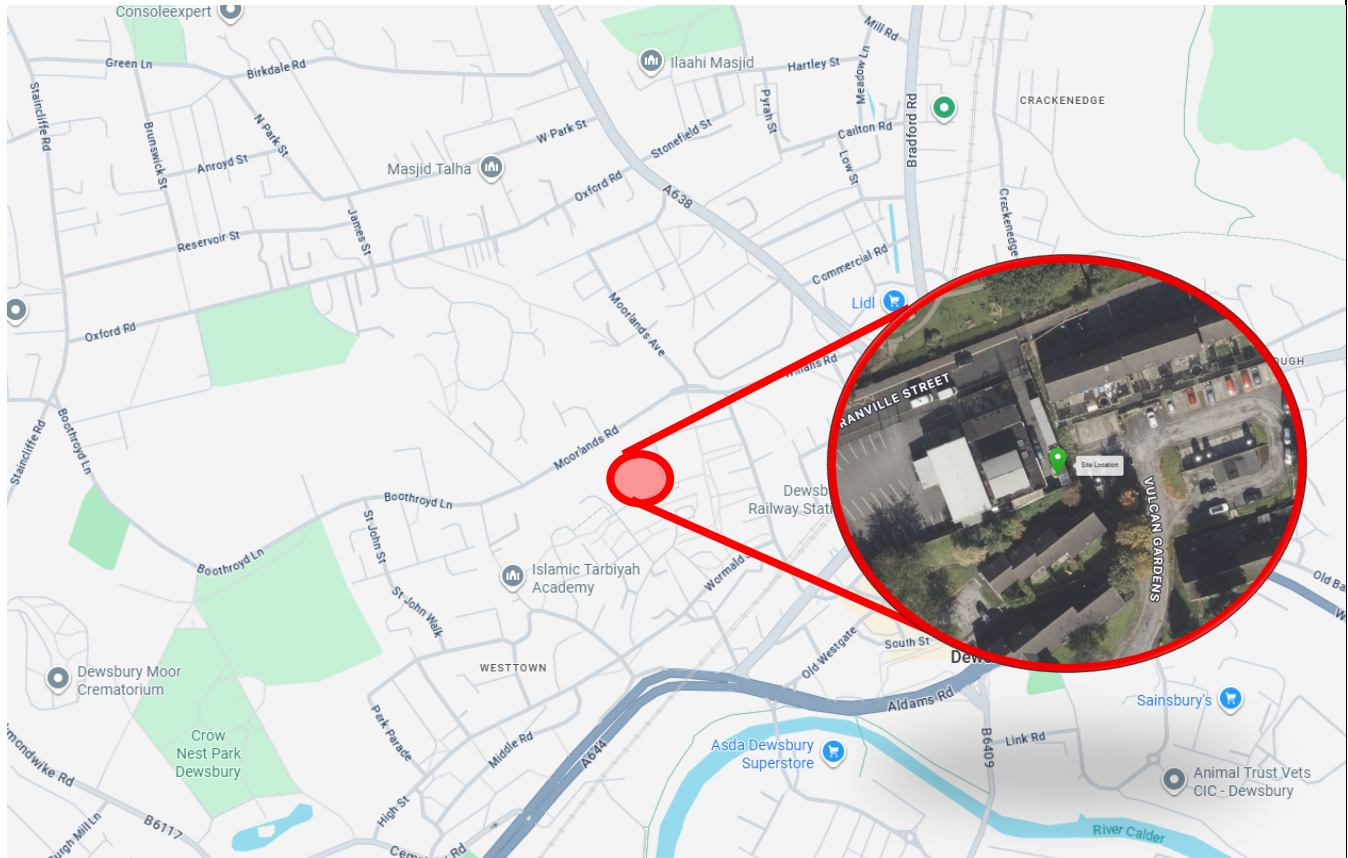


Figure 1: Site Location (Source: Google Maps)

Enclose map showing the cell centre and adjoining cells:

As part of VMO2's ongoing network improvement programme, there is a specific requirement for a new base station installation at Granville Street, Dewsbury to improve coverage across the surrounding area.

Predicted coverage plots can be provided on request.

Type of Structure

Description:

The proposed development comprises the installation of a 22.5-metre-high telecommunications pole on the lands at Granville Street, Dewsbury. The structure will support 6 no. antennas and 2 no. dishes, along with associated ancillary works required for operation. The installation has been designed to support both 4G and 5G technologies and to accommodate equipment for multiple mobile network operators. For full technical specifications and layout, please refer to the enclosed drawing package.

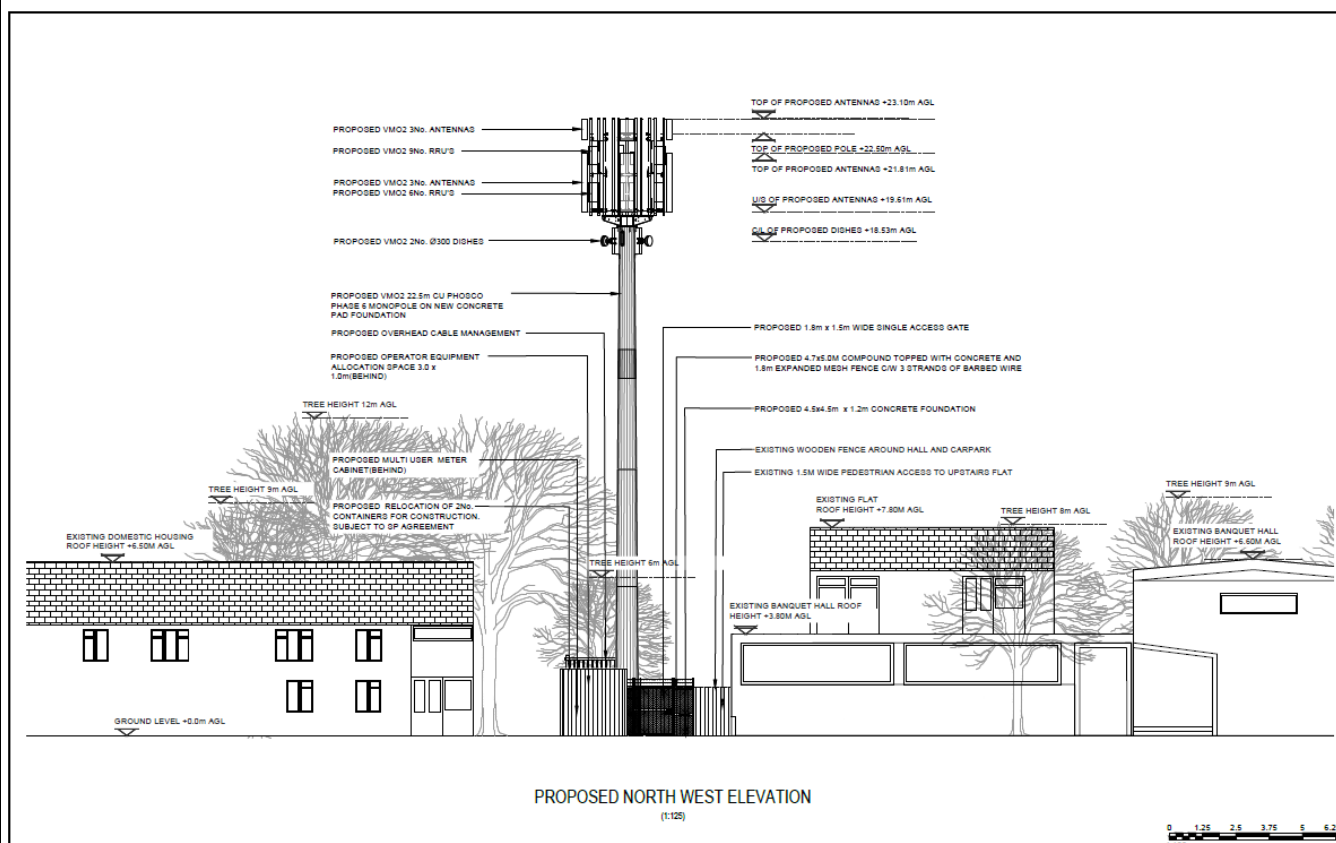


Figure 3: Proposed South East Elevation (Source – Drawing Package – Not to scale)

Overall Height: +22.5m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Pole – type of material and external colour:	Galvanised
Equipment housing – type of material and external colour:	Fir Green (RAL 6009)

Reasons for choice of design:

The National Planning Policy Framework (NPPF) encourages site sharing and the efficient use of telecommunications infrastructure. However, within the defined search area, there are no sequentially preferable or suitable alternative locations. The main purpose of the installation is to enhance VMO2 coverage and introduce new 5G coverage to the region, while providing a structure capable of being shared by all 4no main operators. Currently, VMO2 customers have little to no coverage in this area, therefore there is a growing demand on the operator to reintroduce and improve coverage in the area.

The proposed development consists of the erection of a 22.5m high CU Phosco Phase 6 monopole on a new concrete pad foundation, supporting 6no. VMO2 antennas, 6no. Remote Radio Units (RRUs), and 2no. 0.3m transmission dishes. At ground level, the scheme includes the provision of a 4.75m by 4.0m equipment compound enclosed by a 1.8m high expanded mesh fence with 3 strands of barbed wire. Within the compound, there will be operator equipment cabinets, a multi-user meter cabinet, and ancillary works including overhead cable management.

The height of the pole at 22.5 metres is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area. If the mast height were any lower, it would not be able to provide sufficient coverage to the target coverage area. 5G radio technologies operate in higher frequency bands than older technologies and these higher frequencies naturally result in more signal loss and greater interference from obstacles therefore it will normally require a higher structure to achieve the same coverage footprint. As a result, 5G requires taller structures to achieve the same level of coverage. To improve data speeds and capacity for users, antennas are typically mounted higher than traditional ones. This is why a 22.5-meter mast is essential for providing effective 5G coverage in the area.

RRUs, located approximately 20m above ground, are compact (roughly the size of a shoebox) and are integral to improving antenna efficiency. Their elevated position means they will have minimal visual impact and reduce the need for additional ground-level equipment, helping to limit clutter.

The applicant offers a design and appearance which we believe minimises the overall visual impact of the development, the pole type mast has a slimmer, more compact design (compared to a lattice structure) that reduces visual impact and requires less ground space. This form of structure, augmented by the galvanised finish colour, will further reduce the overall visual impact of the development. The visual impact is further alleviated by the existence of natural topographical features of the land, offering a rising backdrop to the development. Views from road networks are transient in nature and are therefore considered less sensitive than fixed point views.

The Operator has given careful consideration to the design, opting for the pole structure which is capable of supporting current and future technologies and to consolidate elements of site sharing into one location while minimising visual and environmental impact in a slimline design. This design will therefore inevitably require a larger headframe, however the benefit of this is that the structure can be shared, therefore reducing the need for additional installations throughout the area. This therefore conforms to the NPPF in that it avoids the proliferation of masts.

The closest residential properties are those at Vulcan Gardens, however the orientation of the dwellings, away from the mast will ensure that any views are oblique and will not have an unacceptable impact on their amenity.

In summary, this proposal represents the most efficient, least visually intrusive solution for delivering critical 4G improvements and new 5G coverage. It reflects a carefully considered approach to site selection, design, and environmental integration, and responds appropriately to both national planning guidance and the Operator's legal obligations to provide robust, modern communications infrastructure.

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
Under the terms of its licence, Virgin Media O2 Limited (VM02) are required to meet strict coverage obligations, ensuring that the benefits of mobile connectivity are extended to all communities, including those currently underserved.
The NPPF makes it clear that local authorities should not question the need for telecommunications services, nor seek to restrict competition between operators. Nonetheless, the Applicant considers it helpful to set out the technical rationale for this proposal and explain how the site fits within the broader network strategy.
This installation is required to provide improved 4G coverage and brand new 5G coverage for VM02 in Dewsbury addressing existing gaps in service and improving overall network performance in the locality. This area of Dewsbury has limited VM02 coverage, and the applicant has attempted on a number of occasions to improve this coverage, however all attempts have failed. Therefore, this installation is critical to filling in this gap in coverage.
Mobile base stations operate by transmitting radio signals that connect mobile devices to the wider network, allowing users to make calls, send texts, stream content, and access data services. These base stations are linked together—via fibre or wireless links—to form an interconnected network. Each base station serves a defined area known as a cell, and these cells overlap with adjacent ones to create

seamless coverage. The size and shape of each cell can vary depending on local conditions, such as topography, building density, and user demand.

As low-powered radio transmitters, base stations have a limited effective range and must be located within or close to the areas they are designed to serve. Relocating the installation too far from the intended coverage area risks leaving parts of Dewsbury without essential mobile services. For this reason, the proposed location has been carefully selected to ensure the required coverage objectives can be achieved efficiently and effectively.

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

Discounted Options

In seeking to meet growing network demand in the Dewsbury area, the Operator's acquisition and survey agents have made every effort to identify a site that minimises any potential impact on the character of the area. However, in order to effectively deliver improved mobile services, it is essential that the communications site is located as close as possible to the area of customer demand.

In line with the sequential site selection process outlined in the NPPF, the following criteria were followed when identifying a suitable location:

- a) *Mast and Site Sharing*
- b) *Use of Existing Buildings or Structures*
- c) *New Ground-Based Installation*

As required by the Operator's licence and consistent with national planning guidance, the first preference was to utilise existing telecommunications infrastructure where it represented the most environmentally sensitive solution. The Ofcom Site Finder register was consulted to identify potential mast-sharing opportunities.

However, no suitable existing telecommunications sites were identified that could accommodate the extent of equipment required for this proposal. Several rooftop opportunities were investigated but were found unsuitable due to their low elevation, pitched or corrugated tin roofs, and insufficient structural capacity to safely support telecommunications equipment. Ground-based options were also considered; however, many of these were located within small residential greenspaces, where the introduction of a monopole would result in the loss of valued community open land and create significant visual intrusion for nearby occupiers. Other roadside locations were discounted due to highway safety concerns, with installations likely to obstruct sightlines or appear prominently to passing traffic. Taken together, these constraints meant that while a thorough search was undertaken, the majority of candidate sites were discounted as either unviable or inappropriate, as explained in the discounted options section below.

The proposed site on Granville Street was therefore selected after a thorough investigation of alternative locations. It represents the most viable option when balancing technical requirements, environmental impact, and planning policy considerations.

A detailed list of alternative sites considered is provided below, with reasons for their exclusion in favour of the proposed site.

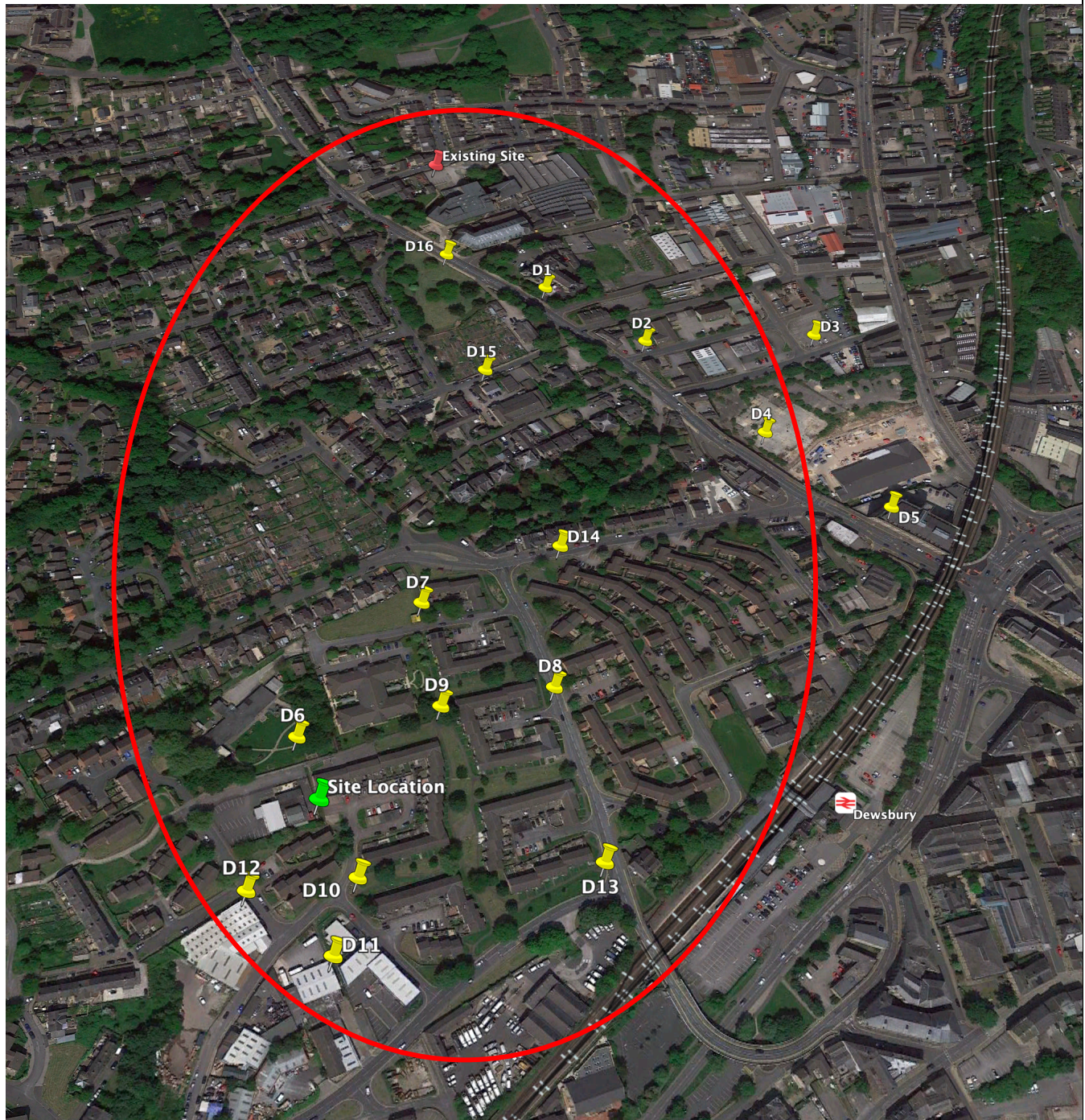


Figure 4: Map depicting discounted options (Source: Grid reference finder)

Site	Address	NGR	Reason for discounting
Existing site	Dewsbury College: Dewsbury Centre, Halifax Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, WF13 2AS	E: 424063 N: 422352	As discussed above, the existing site has been subject to an Notice to Quit 'NTW'. This is essentially a notice served on the operator which states that they no longer have use of the mast, and it requires to be decommissioned. As a result, the operator now requires a new, alternative site close to the NTQ to ensure there is no drop in coverage.
D1 – SW	Municipal Buildings, Halifax Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2BS	E: 424154 N: 422223	A nearby streetworks site was assessed but discounted. The site lies in close proximity to a Grade II Listed Building, where the introduction of a telecommunications installation would have a significant adverse effect on the setting of a designated heritage asset. Furthermore, the adjoining footpath is too narrow to safely accommodate the required equipment, as this would displace pedestrians onto Halifax Road, thereby prejudicing highway and pedestrian safety.
D2 - SW	Albion Street, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2AJ	E: 424230 N: 422177	Similar to D1, the footpath location is considered too narrow and would potentially force pedestrian onto the main road. As a result, this site has been discounted.
D3 - GF	Commercial Road Car Park, Commercial Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2NP	E: 424358 N: 422195	A greenfield option was also explored within a car park on Commercial Road. However, this location falls outside the defined search area and would not deliver the required level of coverage. To compensate, a second installation would be needed, leading to an unnecessary proliferation of masts, contrary to national planning policy objectives set out in the NPPF. In addition, the topography at this location is substantially lower than both the existing and proposed sites, meaning a much taller structure would be required, which would be unacceptable from both a planning and visual impact perspective.
D4 - RT	Kirklees Sixth Form Halifax Road, Eightlands, Flatts, Dewsbury,	E: 424315 N: 422096	This building is far too low to provide the necessary height for a radio base station to comply with ICNIRP guidelines or for the antennas to be able to reach the target coverage area. The building is also unsuitable



	Kirklees, West Yorkshire, England, WF13 2BS, United Kingdom		<p>and would not be able to support a telecommunications installation. The roof is pitched. Telecommunications equipment cannot be supported on pitched roofs. The equipment would slide off under the simple laws of physics.</p> <p>In addition, the building currently hosts Kirklees 6th form, therefore siting a telecommunications installation in proximity to this building would likely cause significant objections from the local community.</p>
D5 - RT	Sprinkwell Mill Apartments, Halifax Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2DS	E: 424398 N: 422025	A rooftop installation requires a flat roof, with sufficient roof space and of a suitable construction to host a stub tower, equipment's cabinets and ancillary equipment. Whilst this building is of a sufficient height to host the equipment, it's roof shape is pitched, this unsuitable for telecommunications installation..
D6- GF	Granville Street, Eightlands, Flatts, Dewsbury, Kirklees, WF13 2NF	E: 424017, N: 421824	This option is located within a small public green space off Granville Street, which is actively used by the local community for informal recreation. The siting of a telecommunications installation in this location would result in the permanent loss of greenspace, conflicting with local planning policies that seek to safeguard urban open areas. The space is tightly enclosed by residential dwellings on multiple sides, meaning a monopole and associated compound would appear highly prominent and visually intrusive. Furthermore, the limited size of the area offers no opportunity to provide meaningful screening or separation from neighbouring properties. As such, the site was considered unsuitable and discounted.
D7 - SW	Ashworth Green, Eightlands, Flatts, Dewsbury, Kirklees, WF13 2ST	E: 424084, N: 421926	This site is located on a green space at Ashworth Green, immediately adjoining a residential car park and surrounded on all sides by housing. While the open land initially appeared suitable, its development for telecommunications would result in the permanent loss of valued greenspace that functions as a buffer and amenity area for local residents. The proximity of the site to dwellings means any monopole and equipment compound would be highly visible from habitable room

			windows, resulting in an unacceptable impact on residential outlook and amenity. The constrained nature of the green area also leaves little scope for effective landscaping or screening. For these reasons, the site was discounted.
D8 - GF	Ashworth Road, Eightlands, Flatts, Dewsbury, Kirklees, WF13 2N	E: 424171, N: 421862	This site is located on a grass verge along Ashworth Road, in close proximity to a busy junction. While accessible, the siting of a monopole and associated equipment in this position would make the installation highly visible to road users. The narrow verge also raises concerns that the development would obstruct visibility splays for drivers manoeuvring at the junction, with potential implications for highway safety. In addition, the location is directly overlooked by residential properties, meaning the mast would have an intrusive impact on visual amenity as well as creating a prominent feature within the street scene. For these reasons, the site was considered unsuitable and discounted
D9 – GF	Vulcan Gardens, Eightlands, Flatts, Dewsbury, Kirklees, WF13 2PP	E: 424102, N: 421847	This location sits within a landscaped amenity space forming part of the Vulcan Gardens residential area. The open nature of the land provides important separation between surrounding flats and houses, contributing to the character of the estate. Introducing a monopole and associated compound in this position would erode that sense of openness and significantly alter the setting of nearby dwellings. The development would appear out of scale in relation to the domestic environment, dominating views across a modest residential square. Unlike more enclosed or industrial sites, this land is integral to the residential layout and therefore particularly sensitive to visual change. On this basis, the site was discounted in favour of locations with a more compatible land use context.
D10 - SW	Lifford Lane, Kings Norton, Lifford, Birmingham, B30 3JH,	E: 405492 N: 279485	This site is positioned on a small green space within Vulcan Close, directly overlooked by surrounding residential flats. Although technically accessible, the constrained size of the land and its role as an amenity area within the estate make it highly sensitive to development. The introduction of a telecommunications installation here would remove an area of community open space and place a visually intrusive structure at the centre of the

			residential block. The close proximity to dwellings would result in an overbearing presence, with limited opportunity for mitigation or screening. On this basis, the site was considered unsuitable and discounted.
D11 - GF	Air Training Corps – 96 (Dewsbury) Squadron, Vulcan Close, Dewsbury, WF13 2NN	E: 424053, N: 421688	This location was considered on the rooftop of the Air Training Corps building at Vulcan Close. However, the building is of a low height with a pitched roof clad in corrugated tin , which is unsuitable for accommodating telecommunications equipment. The construction type does not provide a safe or structurally sound platform to support cabinets, or associated apparatus, and would also pose significant health and safety concerns during installation and maintenance. In addition, the operational use of the site by the Air Training Corps presents further constraints around access and security. For these reasons, the site was considered unviable and was discounted.
D12- SW	Halliley Street, Eightlands, Flatts, Dewsbury, WF13 2TT	E: 424001, N: 421723	This location was considered on the rooftop of a commercial/industrial building off Halliley Street. While the roof is flat, it is constructed from corrugated tin sheeting , which is not structurally capable of supporting telecommunications equipment such as a monopole, cabinets, or associated infrastructure. The lightweight construction raises significant concerns about load-bearing capacity and long-term stability, as well as installation and maintenance safety. Due to these practical and structural limitations, the site was not considered viable and was discounted.
D13 - RT	Ashworth Gardens, Eightlands, Flatts, Dewsbury, WF13 2SS	E: 424203, N: 421747	This location is situated on a landscaped area forming part of Ashworth Gardens, which provides amenity and separation space for surrounding residential properties. While technically feasible, the installation of a telecommunications monopole in this setting would significantly alter the character of the estate and diminish the value of the amenity space. The mast and compound would appear as an intrusive feature within a domestic environment, being visible from a number of dwellings at close range. For these reasons, the site was considered unsuitable and was discounted in favour of a location with a more appropriate context.

D14 – GF	Willans Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2PL	E: 424172 N: 421977	A grass verge location was considered as a potential option. However, notwithstanding its lower topography compared with other sites in the search area, its proximity to nearby residential apartments would raise significant concerns regarding compliance with ICNIRP guidelines. To achieve compliance, a substantially taller structure would be required, which would in turn create unacceptable visual impacts from a planning perspective. For these reasons, this option has been discounted.
D15 -SW	Al-Furqaan Preparatory School, Elmwood Terrace, Eightlands, West Town, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JR	E: 424114 N: 422131	This site was assessed owing to its elevated position, which would in principle allow for a compliant tower height under ICNIRP requirements. However, the site is directly adjacent to a preparatory school, a sensitive land use, and is therefore likely to generate substantial objection from the local community. Furthermore, the footpath at this location is too narrow to safely accommodate the required equipment. Installation here would force pedestrians into the carriageway, thereby creating unacceptable highway safety risks. Consequently, this site has also been discounted.
D16 - GF	Halifax Road, Eightlands, Flatts, Dewsbury, Kirklees, West Yorkshire, England, WF13 2BS	E: 424078 N: 422252	A potential greenfield site was considered but subsequently discounted due to its location within a Conservation Area and its close proximity to a nursery school. Both represent highly sensitive land-use designations, where the siting of telecommunications infrastructure would be inappropriate given the availability of less sensitive alternatives. Accordingly, this site was discounted from further consideration.

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

N/A

7. Additional Relevant Information

Environmental information:

N/A

Land use planning designations:

N/A

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

From the outset, it is important to acknowledge that any alteration to the landscape (regardless of its function as telecommunications infrastructure) will inevitably be noticeable to nearby residents and frequent passers-by. However, visibility alone, or the siting and appearance of a development, does not inherently equate to significant or unacceptable harm.

When assessing the suitability of telecommunications development proposals, it is essential that decision-makers prioritise telecommunications-specific planning policy where such policy exists. In the absence of up-to-date or locally relevant guidance, the provisions of the NPPF must take precedence. It is also important to recognise that it would be unreasonable to expect specialised infrastructure, such as telecommunications equipment, to fully conform to general planning policy criteria that are not tailored to its unique requirements.

The following section sets out the planning policy and guidance considered relevant to this application.

Local Guidance

The Kirklees Local Plan, does not include a specific Telecommunications Planning Policy. However, there are some general principles it must follow. Infrastructure must be designed so that it can adapt to changing technology without harming the appearance of the streetscene or local amenity. New equipment or poles should be sited and designed in ways that minimise visual impact, respecting townscape, heritage, and character of the area. Developers are expected to consider utilising existing structures (e.g. buildings or other installations) or sharing sites where possible, to reduce proliferation of new masts or poles. Finally, proposals should make provision for utilities infrastructure in the design, including ducting for cables, to reduce disruption and ensure future flexibility.

National Planning Guidance

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.”*

Planning Policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The following points are highlighted and commented against.

National Planning Policy Framework (December 2024)

Paragraph 8 states: *'Achieving sustainable development means that the planning system has three overarching objectives are interdependent and need to be pushed in mutually supportive ways*

- *An economic objective – to help build strong, responsive and competitive economy, by ensuring the sufficient land the right types are available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*
- *A social objective - Support strong, vibrant and healthy communities, by ensuring the at a sufficient number and range of homes can be provides to meet the needs of present and future generations; and by fostering well-deigned, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.*
- *An environmental objective - Protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy. The proposed development accords with all these aspects of the NPPF in that it will provide improved network provision within this area bringing a range of associated economic and technical benefits.*

Chapter 10 of the NPPF promotes the development of telecommunication infrastructure but advises that best practice is applied to reduce the proliferation of installations.

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"*.

Paragraph 120 of the NPPF states, *"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"*.

Paragraph 121 states *"Local planning authorities should not impose a ban on new electronic communications development in certain areas. They should ensure that:*

- a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and*
- b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services"*

Paragraph 122 states *"Applications for electronic communications development (including applications for prior approval) should be supported by the necessary evidence to justify the proposed development.*

This should include:

- a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and*
- b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or*
- 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"*

Paragraph 123 states *"Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure"*.

In principle, the erection of a new telecommunications mast and associated infrastructure is acceptable, with clear reference to the above paragraphs of the NPPF, subject to assessment of development management considerations as discussed in turn below.

The UK Wireless Infrastructure Strategy

The UK Wireless Infrastructure Strategy is a new policy framework to drive deployment and adoption of 5G and advanced wireless connectivity; and the government's 6G strategy for the UK.

It highlights the importance of connectivity to the UK and recognises that the UK needs world-class wireless connectivity:

"Connectivity has brought benefits for British households and British business, boosting growth, productivity, and opportunity for all. And change shows no sign of stopping. In fact, we find ourselves on the brink of a new revolution which promises to transform the world once more.

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.

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 power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks.”

The proposed telecommunication equipment will help promote The UK Wireless Infrastructure Strategy by improving coverage and capacity, supporting digital inclusion, facilitating economic growth, and enabling future-proof infrastructure including 5G that will ensure the area doesn't fall behind in coverage and international competitiveness. The proposed development will provide significant public benefit with greater capacity and wireless connectivity for local businesses, residents and visitors to the area.

Planning Assessment

In accordance with Schedule 2, Part 16, Class A of the General Permitted Development Order (GPDO), this development is to be assessed primarily in terms of its siting and appearance. While the provisions of the local development plan are not determinative, they remain material considerations where relevant to matters of design and visual impact. The key issues arising from this prior approval application are whether the proposed structure would appear visually intrusive or out of keeping with the character of the area, and whether any such impact would be outweighed by the substantial social and economic benefits associated with the deployment of 5G and the enhancement of next-generation digital infrastructure.

Siting

As set out above, there is an urgent requirement to enhance mobile network coverage in the Dewsbury area, following the service of a Notice to Quit on the operator's existing site. Thus, a location close to the existing installation is required. Should the development be sited outside of the defined search area, the operator will not be able to achieve the required level of coverage, and a hole in coverage will be experienced in and around the existing installation which would be an unacceptable situation for the operator and would be counterproductive to the design brief of maintaining and improving connectivity in the area. As a result, the new site cannot be located a significant distance away from the previous site.

The identification of a replacement location has been guided by a range of environmental and technical constraints. To the north, the search area is constrained by a designated Conservation Area, while to the south the landform drops significantly in topography. Across the wider area, sensitive

land uses such as schools, residential properties, and allotments further restrict opportunities. Given these constraints, it is inevitable that any replacement mast will be visible to some sensitive receptors.

It must be recognised that the introduction of new telecommunications infrastructure almost always results in a degree of visual impact. However, visibility alone does not equate to harm. The proposed location, to the rear of Eightlands Banquet Hall, has been carefully selected to minimise prominence. The siting ensures that the installation avoids forward-facing views from nearby dwellings and reduces visual intrusion on the wider area.

The resulting visual effects are therefore limited and localised. When weighed against the significant technical and public benefits of securing continued 4G service and delivering new 5G coverage, the proposal clearly meets the policy balance. The scheme's contribution to national and local digital connectivity objectives, as set out in the National Planning Policy Framework (NPPF), outweighs any minor visual impacts.

Visual appearance

The height of the pole at 22.5 metres is the minimum height required to provide high-quality 4G and 5G coverage to the intended target area. It is acknowledged that the development will be visible at close range and from surrounding vistas, however as mentioned above the views will be mitigated by the retention of existing trees and screening were possible.

The width of the pole is the slimmest width possible in order to accommodate the antennas. If the pole were any slimmer, then the equipment required would not be able to fit onto one pole, thus would require a bulkier additional headframe to support the apparatus which would lead to a more obtrusive and bulkier design, taller pole, a more visually intrusive lattice or another base station installation, which would lead to a proliferation of masts.

The mast has a galvanised finish, which is considered to blend into the urban character and the mature trees at Vulcan Gardens. While we are open to amending the colour at the request of the Planning Department, we consider the galvanised finish the most suitable for this location.

Regarding antenna design, it is technically essential that the latest 4G and 5G antennas remain unshrouded. Higher-frequency signals required for fast data transmission are unable to effectively propagate through materials such as Glass Reinforced Plastic (GRP), which would be used in any shrouded enclosure. This limitation applies particularly to 5G but also affects advanced 4G antennas. Shrouding the antennas would compromise their performance, necessitating additional infrastructure elsewhere, again leading to a proliferation of masts.

The cabinets are designed to resemble other statutory operators' equipment cabinets and are commonly found within an urban environment. The equipment cabinets are situated within the proposed fenced compound and will not obstruct pedestrian or traffic flow. They are the minimum number required in order to provide improved 4G coverage to the area as well as 5G coverage. They are coloured fir green to fit onto the grass verge at Granville Street.

In summary, the proposed design is the least visually intrusive whilst achieving the required level of continued coverage, providing brand new 5G coverage to the area (as well as improving the existing 4G coverage). As such the proposal development is sited and design to minimise the impact on the visual amenity, character and appearance of the surrounding areas. The structure makes the most of the existing screening and backdrops and is the minimum possible to be ICNIRP compliant, clear the urban clutter and for the antenna signal to reach the target coverage area. As a result, the proposed development fully accords NPPF by striking a balance between visual and amenity concerns with the operators technical requirements.

Residential Amenity

The nearest residential properties are located along Vulcan Gardens, with further clusters to the east at Ashworth Road and to the southeast at Wormald Street. However, none of these dwellings face the application site directly. Most properties are either offset at an angle or separated by mature trees or intervening buildings which act as a buffer zone.

Importantly, no front-facing habitable room windows directly overlook the site, and existing mature tree cover at Vulcan Gardens and fence along the site's perimeter provides a significant degree of visual screening. As such, the impact on residential outlook is negligible.

The proposed 22.5-metre pole will be sited on a corner of Vulcan Gardens on Granville Street, away from sensitive receptors, and assimilates into a well-established urban area characterised by a mix of commercial, residential, and institutional buildings. While the upper portions of the structure may be visible from select locations, these views are limited and intermittent due to natural and built screening.

The development will not result in any loss of privacy, nor will it emit any noise, odour, artificial light, or vibration that could impact nearby residents. The cooling fans within the equipment cabinets only operate under high temperatures and are not audible beyond a few metres. Site visits for maintenance are minimal and infrequent, generally once per year with handheld tools only.

Given these considerations, the proposed installation would have a limited and acceptable impact on residential amenity, with no material harm to outlook, privacy, or noise conditions. The proposal therefore complies with both national and local planning objectives for protecting amenity.

Public Benefit

The Local Planning Authority must undertake a planning balance, weighing visual and amenity impacts against the operational need, technical requirements, and availability of suitable sites. This balancing exercise is central to the determination of telecommunications applications and appeals. The operator has sought to mitigate potential impacts by locating the installation away from prominent views, dense residential streets, and sensitive land uses. In line with published guidance, the proposed site is the only viable option within the defined search area. As demonstrated in the discounted options assessment, no sequentially preferable alternatives exist.

The demand for mobile data continues to grow rapidly, and robust infrastructure is essential to avoid service degradation. Without new installations, customers will increasingly experience dropped calls, buffering, and restricted access to high-speed networks, undermining the government's commitment to universal digital connectivity. The proposed installation will maintain reliable 4G services while introducing 5G coverage, addressing existing capacity issues and future-proofing the network.

National planning policy strongly supports high-quality telecommunications infrastructure. The NPPF (Paragraphs 112, 116 and 118) recognises that advanced, reliable communications are vital for economic growth, social well-being, and climate change mitigation. Access to mobile networks enables digital inclusion, remote working, online education, e-health services, and broader economic participation. 5G, in particular, will deliver faster and more responsive connectivity, supporting technologies such as the Internet of Things, VR/AR learning tools, and remote healthcare.

Planning Inspectors have consistently confirmed that the public benefits of telecommunications infrastructure outweigh limited localised harm. For example, in Barnet (APP/N5090/W/20/3261084, 2021) and Winchester (APP/L1765/W/18/3197522, 2018), appeal decisions emphasised that maintaining and enhancing coverage carried significant public benefit and national policy support.

APP/N5090/W/20/3261084: ***"The appellant has demonstrated the need for the development and that there are no other realistic options to deliver the installation. I therefore accord the public benefits of the proposal and that the monopoly will be used by another Operator, substantial weight"***

APP/L1765/W/18/3197522: ***"I attach significant weight to the public benefit arising from the continuation of local service provision...Having regard to all relevant considerations, including national planning policy and the potential availability of alternative sites, my findings are that the proposal's public benefit in maintaining and enhancing local telecommunication coverage and capacity would outweigh the limited harm arising to the character and appearance of the area"***

This proposal will support economic prosperity by enabling businesses to grow, residents to connect, and public services to operate more efficiently. It will also contribute to environmental objectives by reducing travel and carbon emissions through greater reliance on digital connectivity.

In summary, the proposed installation represents the only viable site to maintain continuity of service and deliver the step-change in connectivity required by 5G. The scheme accords fully with the NPPF and wider government ambitions to ensure the UK has resilient, high-quality digital infrastructure.

Conclusion

To conclude, there is a well-documented gap in mobile phone coverage within the Granville Street area of Dewsbury. The proposed development on the land off Granville Street, Dewsbury addresses this critical gap by delivering improved 4G coverage and brand-new 5G capability to the area.

The installation seeks to replace the coverage lost following the serving of an NTQ on the existing site. The new installation cannot be sited too far away from the existing NTQ site, as it would ultimately lead to a loss of coverage, which is unacceptable for the Operator. Given the restrictions of the search area, a new site will be visible from certain vistas, this not necessarily equate to visual harm and in any case, the visual impact must be weighed against the public benefit of the scheme, combined with lack of alternative options currently available to the operator. A comprehensive site search and assessment of discounted alternatives has demonstrated that this is the most suitable and sustainable location available within the defined search area. All other considered options were ruled out for various reasons s outlined in Section 5 of this report

The proposed development will maintain and enhance coverage in the area, providing a shared structure capable of hosting a number of operators, representing a significant public benefit for the local community.

The proposed development would not cause harm to residential amenity in terms of noise, privacy, or outlook, and accords fully with the requirements of both local planning policy and the National Planning Policy Framework (NPPF), particularly in relation to digital infrastructure provision and sustainable development.

For these reasons, the proposed telecommunications installation is considered wholly appropriate in planning terms and is respectfully submitted for the local planning authority's approval under the prior approval process.

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