

## SUPPLEMENTARY INFORMATION

### 1. Site Details

Site Name:	HUDDERSFIELD WATERLOO	Site Address:	BANKFIELD LANE, KIRKHEATON, HUDDERSFIELD, HD5 0JW
National Grid Reference:	417605E, 418030N		
Site Ref Number:	11490224	Site Type: <sup>1</sup>	MACRO

### Site Background information:

As part of VMO2's continued network improvement program, there is a specific requirement for a radio base station upgrade at the above location to provide enhanced connectivity to the area. An existing telecommunications site is already present at this location; however, the current equipment cannot accommodate the operator's latest requirements. As such, replacement equipment is needed in order to implement this upgrade to VMO2's service.

This application therefore seeks consent for:

*The removal of the existing 20m monopole supporting 6no. antennas, the existing 2no. cabinets and associated ancillary equipment. Replacement with a 20m monopole and headframe supporting 9no. antennas, 1no. relocated 0.3m dish and ancillary equipment, 3no. cabinets, 1no. meter cabinet and associated ancillary equipment all within the redundant compound adjacent to the existing mast.*

### 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	<b>No</b>
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<sup>1</sup> Macro or Micro

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Registered Address:  
 Cornerstone Telecommunications, Infrastructure Limited,  
 Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.  
 Registered in England & Wales No. 08087551.  
 VAT No. GB142 8555 06

Sinclair Dalby Limited, 3 Princes Street, Bath, BA1 1H  
 Registered Office, Sinclair Dalby Limited, 11 Windell Street, Bath, Somerset, BA2 5BG. Registered in England 7610197.

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If no explain why:		
No mast register exists. A physical search of the area was undertaken prior to the selection of a suitable site, to identify any potential opportunities for mast or site sharing.		
Were industry site databases checked for suitable sites by the operator:	<b>Yes</b>	No
If no explain why:		

### Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
A description of the proposal and drawings were sent to Kirklees Metropolitan Council by email on 30 <sup>th</sup> October 2025.	
No response has been received to date.	

### Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	Please see commentary below

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Summary issues raised:

Cornerstone's commercial relationship with VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer has visibility of VMO2's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.

Cornerstone aims to engage and work with the planning department at the earliest opportunity from when it is instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.

### Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	<b>Green</b>
Outline of consultation carried out:			
<p>A description of the proposal and drawings were sent to the following for comments by email on 30<sup>th</sup> October 2025:</p> <ul style="list-style-type: none"> <li>• Dalton Ward Councillors: Munir Ahmed, Tyler Hawkins and Musarrat Khan</li> <li>• Kirkburton Parish Council - Clerk</li> <li>• Spen Valley MP</li> </ul>			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
No responses have been received to date.			

### School/College

Location of site in relation to school/college (include name of school/college):
No schools in proximity.

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Outline of consultation carried out with school/college (include evidence of consultation):  N/A
Summary of outcome/main issues raised (include copies of main correspondence):  N/A

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

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

**Developer's Notice**

Copy of Developer's Notice enclosed?	<b>Yes</b>	No
Date served:	10 <sup>th</sup> November 2025	

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### 3. Proposed Development

**The proposed site:**

This existing site which requires an upgrade to accommodate increased network demands, provide modern equipment and allow for continued consistent coverage to be provided to this area by VMO2.

This proposal forms as part of a continued network improvement program to future proof the network and ensure improvements in capacity for the area. A sequential approach has been taken to ensure that existing masts and equipment are used where possible. Following technical assessment however, the existing installation cannot accommodate the operators' latest technical requirements. As such new equipment is required for this upgrade at this location as described below.

The site upgrade is needed to provide enhanced coverage and capacity as well as new 5G service provision to ensure that customers experience access to the latest technologies currently available. The installation will also meet the extra demands on the network in this area as new technologies improve increasing the demand for 4G and 5G technologies.

The existing mast is situated immediately north of the Kirkheaton Cricket and Bowling Club grounds, off Bankfield Lane. The site is accessed via an established unmade track leading from Jagger Lane, which connects to the surrounding local road network. The area around the mast is predominantly open grassland and agricultural fields, with residential housing concentrated to the east along Bankfield Avenue and surrounding cul-de-sacs. Given its location adjacent to established recreational land and away from primary residential clusters, the site remains a suitable and low-impact location for telecommunications infrastructure and the upgraded equipment is not expected to give rise to any adverse impact on the surrounding amenity.

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

*The removal of the existing 20m monopole supporting 6no. antennas, the existing 2no. cabinets and associated ancillary equipment. Replacement with a 20m monopole and headframe supporting 9no. antennas, 1no. relocated 0.3m dish and ancillary equipment, 3no. cabinets, 1no. meter cabinet and associated ancillary equipment all within the redundant compound adjacent to the existing mast.*

Whilst it is noted that the installation is located within the Green Belt, there are no other adverse planning constraints on the site detailed within the Development Plan, and

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no designated environmental or heritage designations are present in the immediate area.

The existing installation at this location is shown below:



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

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Enclose map showing the cell centre and adjoining cells if appropriate:
N/A – Existing mast location.

Type of Structure (e.g. tower, mast, etc):	
Description:	
The removal of the existing 20m monopole supporting 6no. antennas, the existing 2no. cabinets and associated ancillary equipment. Replacement with a 20m monopole and headframe supporting 9no. antennas, 1no. relocated 0.3m dish and ancillary equipment, 3no. cabinets, 1no. meter cabinet and associated ancillary equipment all within the redundant compound.	
Overall Height:	20 Metres (to top of antennas)
Height of existing building (where applicable):	N/A Metres
Equipment Housing: EFF1 Cabinet	
Width:	2.100 Metres
Depth:	0.725 Metres
Height:	0.850 Metres
Equipment Housing: 2 x EFF2 Cabinets	
Width:	2.00 Metres
Depth:	0.65 Metres
Height:	0.60 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Monopole – steel – galvanised
Equipment housing – type of material and external colour:	Cabinets - steel – grey

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

A replacement mast is required in this location to provide upgraded coverage and capacity to the locality.

The proposal to upgrade an existing installation is in accordance with the sequential approach to site selection criteria set out within the Code of Practice for Wireless Network Development in England (2022) and is encouraged within the National Planning Policy Framework (2024) over the development of a, separate, new telecommunications site.

The proposed development has two main elements, the monopole which supports the antennas and the microwave dish, and the ancillary equipment (including equipment cabinets). All are required to successfully deliver mobile phone signal to a locality.

This proposal seeks to replace the existing monopole with a new, larger monopole featuring an open headframe. The wider headframe is required to support the increased number of antennas and ancillary equipment. The existing monopole is structurally incapable of accommodating the heavier and larger equipment necessary for the upgrade.

The replacement mast will retain the existing height of 20m to satisfy technical constraints, while providing the increased structural capacity required for both current and reasonably foreseeable future equipment, in line with the NPPF.

Under this proposal, the existing 6 antennas and associated equipment will be replaced with 9 antennas and ancillary equipment, all mounted on the new headframe. The larger headframe is necessary to support the weight and size of the upgraded antennas. The existing 0.3m microwave dish will be relocated below the antennas on the new monopole.

At ground level, the existing equipment cabinets will be removed. 3no. new cabinets and 1no. meter cabinet will be installed on a new concrete base to the south of the replacement monopole, within the existing redundant fenced compound. These cabinets are required to ensure the installation functions effectively and delivers the necessary coverage and connectivity.

The finish of the mast is proposed to be galvanised. The applicant would however be open to amending the proposed colour if considered necessary or appropriate by the Council.

In all aspects of the design the smallest practical components have been utilised to ensure that the visual impact of the development is kept to a minimum and to streamline the design as much as possible. It should be noted that

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telecommunications development is subject to a number of technical constraints and that the selected design has been chosen to balance both the technical requirements of the operator and technical performance, with the planning considerations and impact on visual amenity.

### **Summary**

The proposed design has therefore sought to strike an appropriate balance between operational, environmental and planning considerations. The upgrade installation of this site shall maintain network services and provide improved coverage to this area of Kirkheaton.

### **Health and Safety - including ICNIRP compliance**

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

In order to minimise interference within its own network and with other radio networks, VMO2 operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of VMO2's network, the radio base station that is the subject of this application will be configured to operate in this way.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

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#### 4. Technical Justification

Reason(s) why site required e.g. coverage, upgrade, capacity

As part of VMO2's continued network improvement program, there is a specific requirement to upgrade the existing radio base station at this location to maintain/enhance the coverage in the area. An existing telecommunications site has been identified; however, the current equipment cannot accommodate the latest requirements. As such, the equipment needs to be replaced in order to implement this upgrade to VMO2's services.

The site is needed to provide enhanced coverage and capacity as well as new 5G service provision to ensure that customers experience access to the latest technologies currently available. The installation will also meet the extra demands on the network in this area as new technologies improve increasing the demand for 4G and 5G technologies.

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

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

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

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

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area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular more base stations are needed to ensure continuous coverage.

## 5. Site Selection Process

### Alternative sites considered and not chosen

Site Type	Site name and address	National Grid Reference	Reason for not choosing site
D1 Greenfield	GF at East Corner of Cricket Club, Bankfield Lane, HD5 0JW	417752, 417932	An installation at this location is considered less suitable due to its high level of visibility, limited natural screening or backdrop, and proximity to surrounding residential properties. This site has therefore been discounted for this reason.
D2 Greenfield	GF at Bankfield Lane Playing Fields, Bankfield Lane, HD5 0JN	417849, 417825	An installation at this location is considered unsuitable due to its high visibility, limited natural screening or backdrop, and proximity to surrounding residential properties. This site has therefore been discounted for this reason.
D3 Rooftop	RT at Kirkheaton Crown Bowls Club, Jagger Lane, HD5 0RB	417615, 418014	The rooftop is too low to deliver the required level of coverage to the target coverage area. This site has therefore been discounted for this reason.
D4 Greenfield	GF at Ashgrove House, Bankfield Lane, HD50JG	417912, 417876	A mast at this location is not considered feasible due to a physical lack of available space to accommodate the structure and associated equipment safely and effectively.
D5 Streetworks	SW on Bankfield Lane, HD5 0JF	417952, 417921	The footway at this location is insufficiently wide to accommodate the operator's equipment safely. Installing the equipment here would therefore

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			create potential highway safety risks, and the site has been discounted on this basis.
D6 Greenfield	GF at Kirkheaton Engineering Ltd, Bankfield Lane, HD5 0JF	417982, 417975	There is outlining planning to demolish warehouse and erect residential buildings at this location and therefore is not deemed suitable for telecoms installations.

Figure 1 - Map showing discounted options



Existing Site	
D1	Greenfield at East Corner of Cricket Club
D2	Greenfield at Bankfield Lane Playing Fields
D3	Rooftop at Kirkheaton Crown Bowls Club
D4	Greenfield at Ashgrove House GF
D5	Streetworks on Bankfield Lane
D6	Greenfield at Kirkheaton Engineering Ltd

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

N/A - alternative locations set out above.

This application seeks to upgrade an existing site which has been positioned to ensure the most effective delivery of mobile phone signal to the locality. The proposed scheme, whilst wider than the existing installation is still considered to be acceptable given the existing land use and is therefore considered suitable in siting and appearance terms, given the context of the surrounding area.

Land use planning designations:

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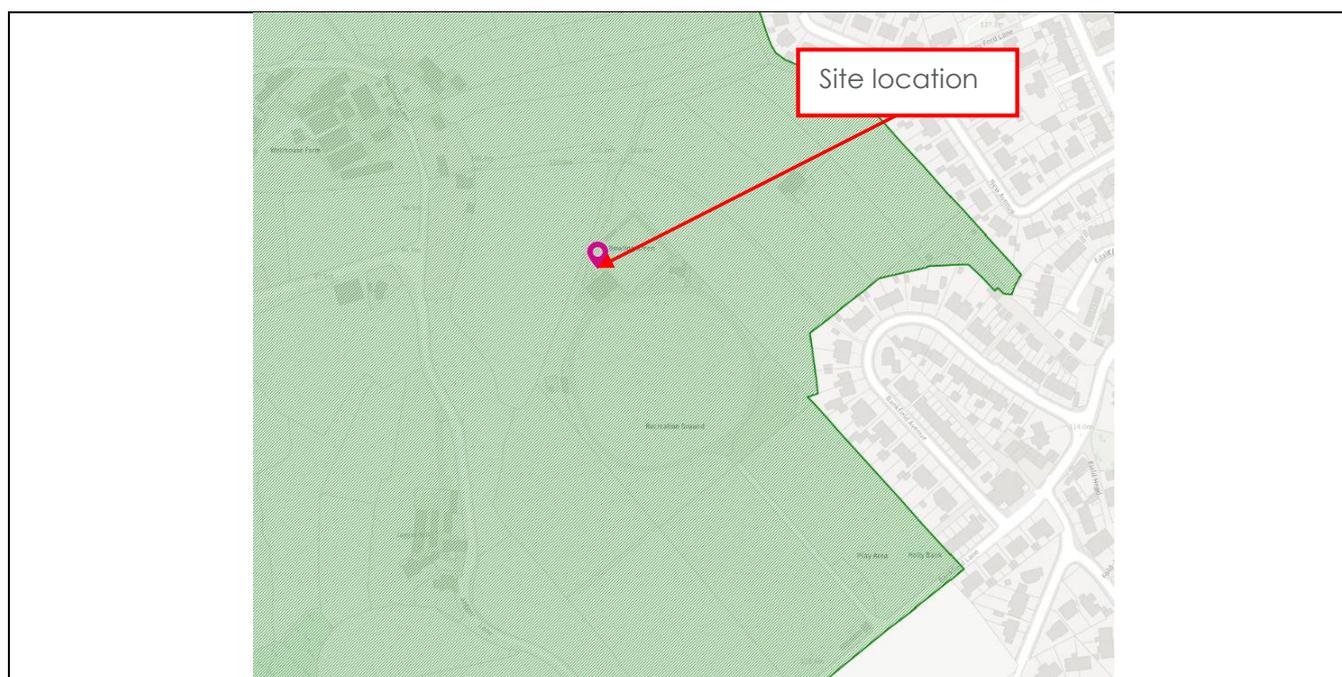
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The site is located within the Green Belt area and is not subject to any additional planning constraints.

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

### Relevant Planning Policy

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

- The Town and Country Planning (General Permitted Development) (England) (As Amended) - Schedule 2, Part 16
- National Planning Policy Framework (2024) – Chapter 10, Supporting High Quality Communications Infrastructure
- National Planning Policy Guidance
- Kirklees Local Plan (adopted on 27 February 2019) – No Specific Telecommunications Policy; Policy LP4 - Providing Infrastructure; Policy LP24 - General design policy; Policy LP61 – Development in the Green Belt.

Other relevant documents:

The Code of Practice for Wireless Network Development in England (2022) – Published by DCMS – this document sets out the legal and policy framework for the delivery of

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wireless infrastructure development. It also provides design guidance and advice for local planning authorities when determining applications.

## **Schedule 2, Part 16 of the GPDO**

Schedule 2, Part 16 of the GPDO relates to the Prior Approval process for telecommunications development. This legislation has established the principle of telecommunications development. Prior Approval is therefore only assessed on the basis of siting and appearance. The development plan and NPPF (2024) is therefore only considered relevant in as far as it relates to the matters of siting and appearance.

## **National Planning Guidance National Planning Policy Framework (2024)**

The Government's National Planning Policy Framework came into force in 2012. The guidance has most recently been revised in 2024. The NPPF sets out the Government's planning policies for England and how these should be applied.

The Government's latest thinking continues to strongly support communications infrastructure. The NPPF remains very supportive of high-quality communications. Indeed, a whole chapter (Chapter 10) 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 supports the expansion of telecommunications 'Planning policies and decisions should support the expansion of electronic communications networks'... (para 119).

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

**Paragraph 123** of the NPPF retains the guidance set out in paragraph 46 of the 2012 NPPF version which relates to determining applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

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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'.

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 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'

Public benefits are defined within Planning Practice Guidance (para 020 Reference ID: 18a-020-20190723) as anything that delivers economic, social or environmental objectives as described in the NPF under paragraph 8 (2024). The PPG states that public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

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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.

In order for the UK to benefit from the huge potential of a reliable mobile network, Local Planning Authorities will have to weigh the Public Benefits of such connectivity with the requirements to instruct and manage the built environment. Central Government understands that this may present concerns with the various design solutions proposed but it is important that all Local Planning Authorities understand the technical needs of the network and better understands the wider advantages of such new technology.

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

The Code of Practice provides guidance to Code Operators 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. 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.

Led by the Department for Digital, Culture, Media and Sport (DCMS), this Code of Practice has been 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 (2016).

**Paragraphs 8 -11** of the Code of Practice set out the importance of connectivity:

'Digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK.

As the demand for mobile data in the United Kingdom is increasing rapidly, it is important that everyone has access to dependable and consistent mobile coverage where they live, work and travel.

The Future Telecoms Infrastructure Review (FTIR) and the National Infrastructure Strategy set out the government's long-term strategy for meeting its digital connectivity targets and delivering high quality, reliable digital infrastructure that works across the UK2.

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The government has committed to extending mobile coverage across the UK. The government has committed to extending mobile coverage across the UK. The government's Levelling Up White Paper has set a mission that the UK will have nationwide 4G coverage, with 5G coverage for the majority of the population by 2030. In support of this, the government and the UK's mobile network operators agreed a £1 billion Shared Rural Network deal to extend 4G mobile geographical coverage to 95% of the UK by the end of the programme.

**Paragraph 13** of the Code of Practice acknowledges the role of the planning system in the delivery of digital infrastructure:

'The planning system plays a key role 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 18** of the Code of Practice sets out the principles and commitments that operators should follow when developing their networks inter alia:

- Site sharing and use of existing structures: make use of existing structures, sites and masts wherever possible to reduce the need for new development.
- Consultation with local planning authorities, local communities and other stakeholders 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.
- Compliance with guidance laid out in the International Commission on Non-ionizing Radiation (ICNIRP) public exposure levels guidance.

The Code of Practice also sets out the requirements of the LPA in relation to the deployment of digital infrastructure:

- 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.

**Paragraph 22** of the Code of Practice acknowledge the limitations to siting and design:

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'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'.

**Paragraph 23** goes on to advise that telecommunications development is sustainable development and should be supported:

'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'<sup>3</sup>.

The Code of Practice explains the operators site selection and that they use a range of sophisticated, computer-based planning tools to predict levels of signal strength and coverage from sites for 2G, 3G,4G and 5G. For a site to be suitable it needs to have 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. It acknowledges that operators typically look to upgrade existing infrastructure prior to considering a new deployment.

The Code of Practice sets out general siting and site selection principles including (para 25):

'where possible operators should look to use existing buildings/structures for hosting wireless infrastructure, to reduce the environmental impact of installation. Where the erection of a new ground-based mast is required, operators should seek measures to reduce the impact of the development, where possible. For example, measures such as siting near similar structures, screening, and using simple designs and appropriate colouring can help reduce the impact of the new infrastructure in certain locations'.

A balanced approach is sought between the technical needs and constraints of the proposed site and the potential impact of the development (para 26 of the Code of Practice). There are three technical and operational considerations for the installation of sites:

- **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 demand for network capacity in a particular area, additional sites may be required within that coverage area to meet the demand.

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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.

The Code of Practice states that planning authorities should consider these issues and consider the need for a site within a limited search area alongside the public benefit of improved connectivity. 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.

The Code of Practice notes there are factors which affect the type of infrastructure that will be deployed including location and the coverage and capacity requirements. Planning authorities should be aware of these constraints when considering proposals.

It is advised that all new masts should be sited, so far as practicable, so as to minimise their impact on their setting, including the landscape and any buildings. Where appropriate masts should be coloured to match their backdrop to minimise contrast in an urban or rural setting.

The Code notes that new ground-based masts will sometimes be required to accommodate the ever-increasing coverage and capacity needs of the country. 4G and 5G are likely to require further network densification in order to meet growing customer demand for data.

### **Kirklees Local Plan 2019**

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

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

*This upgrade installation is required in order to address the escalating requirement for efficient up-to-date telecommunications services in this area of Kirklees.*

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

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*This proposal will provide a much-needed improvement to the service currently provided for the VMO2 customers.*

Section 11.8 reads:

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

*The upgraded installation will provide superfast broadband provision to the district by accommodating the equipment required to make this possible. The proposed design is considered to be in keeping with the existing installation and suitable in siting and appearance terms given the context of the surrounding area.*

## **Planning Assessment**

### **Principle of Development**

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

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

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

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

Chapter 10 [**Para’s 119-123**] (Supporting High Quality Communications) is most relevant to this application.

**Paragraph 119** states that “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks,

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including next generation mobile technology (such as 5G) and full fibre broadband connections”.

**Paragraph 120** states that “The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks [emphasis added], or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”.

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

This proposal seeks to upgrade the electronic communications network to provide advance, high quality and reliable communications infrastructure in accordance with para 119 of the NPPF. This development is proposed following an identified need for improved coverage to meet customer demand, to ensure the efficient operation of the network and provide reasonable capacity for future expansion. The operator has taken a sequential approach to development and has explored the use of existing masts, sites and buildings. In this instance it has been possible to locate and upgrade an existing installation to meet with requirement in accordance with para 120 of the NPPF.

The proposed development will ensure the continued delivery of high-quality coverage, improved capacity and meeting future technical requirement for VMO2 supporting people to work from home and businesses to have access to superfast internet whether on the road, in their offices or working from home. The continued provision of coverage to the area and improvements in network capacity will deliver a host of community benefits, including access to online banking and health services to name but a few. The availability of coverage and capacity ensures access to friends and family, as well as groups and activities online which can improve physical wellbeing and reduce social exclusion. With regard to climate change, the telecommunications network can assist in the roll out of smart metres and other smart technologies which will help to reduce energy consumption and build general resilience. The continued provision of and improvement to the existing telecommunications network by providing 5G coverage is key to economic, social and environmental improvement.

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At a local level the proposed development contributes to sustainable economic growth and digital inclusion in line with spatial strategic objectives as set out in the Local Plan.

### **Design and Appearance**

As set out above, this is an established site which is already providing coverage for this area for VMO2. The proposed development seeks to provide improved coverage and capacity to the locality for the operator including the provision of new 5G coverage.

The upgrading of an existing site is in accordance with the sequential approach to development set out within the NPPF (2024). Para 120 states *“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”*.

The upgraded site is proposed in the same location as the existing where the principle, siting and appearance of telecommunications development has been established. The proposed development, which has been designed to meet both technical/operational requirements and planning considerations, has been reviewed in the context of the existing site and surrounding area, and is still considered to be appropriate in character and amenity terms for this location.

The proposed upgrade is essential to support the provision of high-quality digital infrastructure, enhancing 4G and introducing or expanding 5G coverage in the area.

The design and type of equipment to be deployed has been chosen to provide the greatest possible coverage while, so far as is practicable, minimising the impact on character and amenity and keeping in line with the existing installation.

Policy LP24 of the Local Plan states that good design should be at the core of all proposals in the district and should be considered at the outset of the development process. Policy LP24(a) states that proposals should promote good design by ensuring the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape. Section B and C of Policy LP24 of the Kirklees Local Plan states that development should: *“...maintain appropriate distances between buildings’ and ‘...minimise impact on residential amenity of future and neighbouring occupiers.”*

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Following a review, it was identified that the current design does not allow for the installation of the latest technologies and frequencies (including 5G) which are now more prevalent and relied upon / expected by customers. To ensure that the most up to date equipment is deployed to meet customer commitments and government aspirations with respect to the roll out of 5G, it is necessary to amend the design to a structure capable of taking the size, weight and wind loading and which is in turn supported by the correct ancillary equipment.

The proposed design seeks to replicate the existing as far as possible. A change of the mast design from slimline monopole to monopole with open headframe is required to upgrade the site. As such a more robust mast is now required to ensure that the design is structurally sound.

The existing 20m monopole supporting 6 antennas and associated ancillary equipment will be removed and replaced with a new 20m monopole supporting 9 antennas and ancillary equipment. The replacement antennas will be mounted on the new headframe. The existing dish will be relocated onto the new monopole beneath the antennas. Replacement ancillary equipment will be mounted behind the antennas onto the headframe. This equipment is generally small and is designed to make the antennas more efficient, allowing the amount of ground-based equipment cabinets to be reduced and ensuring that a simple design solution can be proposed.

The existing equipment 2no. cabinets will be removed and 3no new cabinets and 1 no. meter cabinet will be installed on a new concrete base within the existing fenced compound. The equipment cabinets are designed to appear like other statutory undertakers' equipment cabinets. The size of the cabinets has been dictated by technical requirements to support the mast and antennas however the number of cabinets has been kept to a technical minimum. The cabinets are proportionate in size and will be read in the context of the mast. They will be understood as functional infrastructure associated with telecommunications development. The cabinets are low level structures that are of a design typically found within a highway's environment.

The existing height of 20m has been retained. The operator's antennas must be able to rise above any obstruction within the environment (including built form, vegetation and variations in topography) and their dishes must also have a clear line of site to other dishes in the network to form a link. In addition, 5G signal is also more prone to 'clipping' than previous technologies, this means the signal is much more easily interrupted by existing 'clutter' in the environment, including built form and more relevant in this instance, vegetation, than previous technologies. This is the lowest possible height which can still deliver the required levels of mobile phone signal to the locality.

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The replacement installation would be slightly relocated to the south and would be wholly contained within the existing redundant compound.

The finish of the monopole and cabinets will be grey. Whilst the proposed colour scheme has been selected taking into consideration the specific site context, the applicant would be willing to adhere to any colour scheme deemed more appropriate by the local authority.

The existing site benefits from being situated immediately north of the Kirkheaton Cricket and Bowling Club grounds, well removed from any residential properties. This setting significantly reduces the potential for adverse visual, or amenity impacts on sensitive receptors. While the replacement of the existing mast with a stronger, wider structure will result in a more noticeable presence, the proposed installation remains appropriate given the character of the surrounding environment. The site benefits from existing screening provided by hedgerows and tree lines along field boundaries, reducing visual intrusion from nearby residential areas. As such, the replacement installation will be viewed as a continuation of the site's existing function and visual character, rather than as an intrusive or out-of-place addition.

It is considered that the proposed development would not result in harm above and beyond that which has already been accepted and would bring significant public benefit with regard to improved connectivity to the area.

Given its limited scale, established location, and functional appearance, the proposal will not have an adverse impact on the openness or visual amenity of the Green Belt. The development therefore accords with Policy LP61 (Development in the Green Belt) of the Kirklees Local Plan and the provisions of the National Planning Policy Framework, which permit essential telecommunications infrastructure where the impact on the Green Belt is appropriately mitigated.

In summarising, whilst there will be some visual impact it is contended that the character and appearance of the area will not be unacceptably harmed, and the overall benefits of the proposal, including the provision of new 5G coverage, will outweigh any perceived harm. The development therefore complies with local and national policy objectives for sustainable digital connectivity while safeguarding the Green Belt environment.

The development makes efficient use of an established telecommunications site, thereby avoiding the need for a new installation elsewhere and minimising visual impact through continued use of a location that is already associated with such infrastructure. The upgraded mast is required to meet current technical and

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operational demands, and its design has been carefully considered to ensure it remains appropriate to the surrounding industrial context.

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

Having regard to the assessment above, it can be seen that the scheme as proposed within this application has been sited and designed in line with all national, local and international guidelines as well as the telecommunication industries Code of Best Practice for Wireless Network Development in England (2022) when taking into account the technical constraints that exist.

### **Other relevant information:**

#### **Need for Improved Coverage and the provision of 5G services**

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

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

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

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The critical nature of these services was made ever more apparent during the Coronavirus pandemic. The June 2022 'Online Nation Report' (OFCOM) highlights this, finding that "The global pandemic since March 2020 has resulted in significant changes in online behaviour; in particular, our online shopping habits that developed during lockdown periods appear to be here to stay. Overall, online companies grew in 2021. The largest online platforms' revenues and profits increased significantly during the lockdown periods and this growth continued in 2021. The growth is being driven by UK consumers' increasing spend on e-commerce and entertainment subscription services, while advertising revenues are also increasing with the continuing brand migration to online".

The more recently published 2024 Online Nation Report (Ofcom, November 2024) shows a continuing and increasing reliance on telecommunications and the services it provides for as part of everyday life.

The report found that the average UK adult spends 4 hours and 20 minutes a day online across smart phones, tablets and computers. Three quarters of the time spent online per day in May 2024 by UK adults was on smart phones. Two-thirds (67%) of online adults agree that for them the benefits of being online outweigh the risks. Ofcom's research showed how being online can provide adults with opportunities for connection, education, entertainment and creativity. Seven in ten adults (72%) agreed that being online had helped them to learn a new skill, and 77% agreed that being online had helped them broaden their understanding or view of the world. Over half of UK online adults visited NHS online in May 2024. On an average day 35% of UK online adults visited Amazon, the UK's leading online retailer with 88% (41.5million) of UK online adults visiting in the month of May 2024.

Ofcom's 2024 communications market report (interactive data published in July 2024) also reaffirms the importance of mobile technology in the UK. The average monthly data volumes per mobile data user increased by 1.7 GB (21%) to 9.9GB per month in 2023. Across all mobile users, average monthly data consumption was 8.8GB, also a 21% increase year on year. The total number of mobile subscriptions also increased by 4% to 116.1 million in 2023. The largest year on year increase was 2.6 million for mobile phone subscriptions.

It is clear therefore from a factual and research backed perspective that there is a continuing need for the provision of mobile services and data-based technologies, such as 4G and 5G services (provided by this proposed development) and that these are increasingly important to our everyday lives year on year.

In 2021, Matt Warman MP, the previous minister for Digital Infrastructure, wrote to English Local Authority Chief Executives. The letter dated 24 May 2021 accompanied

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the 'Consultation on Changes to Permitted Development Rights for Electronic Communications Infrastructure' within which he states:

"Digital connectivity is – now, more than ever – vital to enable people to stay connected and businesses to grow. The demand for mobile data is increasing rapidly, and the COVID-19 pandemic has highlighted how important it is that we all have access to reliable, high quality mobile connectivity...The planning system plays a key role in delivering the infrastructure that we need as households and businesses become increasingly reliant on mobile connectivity."

This has since been supported by the more recently written letter to Council Leaders and Executives in November 2024 from Chris Bryant, Minister of State (Department for Science, Innovation and Technology) in which it is acknowledged as follows:

"Fast and reliable digital connectivity is increasingly important to our way of 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 committed to supporting the delivery of next-generation connectivity to communities across the UK by driving towards nationwide gigabit broadband and 5G coverage by 2030.

We need your help to achieve these goals. Broadband and mobile rollout rely heavily on local authorities prioritising digital infrastructure and placing it at the heart of their wider Place strategy".

Upgrading digital telecommunications is evidently a key Government priority and one that is also set out in detail in the NPPF (2024) and summarised within the DDCMS Connected Growth Manual (2019). The Government wants the UK to be a world leader in 5G and has set a target for "the majority of the UK population to have access to a 5G signal by 2027" (House of Commons Library, Building Telecommunications Infrastructure, August 2021). Critical to achieving this is the ability of operators to deploy appropriate infrastructure and in this instance, provide upgraded, replacement or new sites to ensure the continuation and development of these services.

### **Differences between 4G and 5G**

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

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

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

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

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

### **Public Benefits Associated with 5G**

Improved home working – 5G rivals the speed of fibre broadband and can provide much needed connections where internet connections are still poor and in need of updating. Everyone will have access to fast and uninterrupted sharing, streaming, and browsing via their mobile phone network. It will mean accessible near-gigabit-capable speeds when you are out and about and could, in the future, work alongside or provide an alternative to fibre and wires in the home.

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

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

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

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

**Economy and Society** – 5G will enhance customer experience particularly for industries such as the retail economy with stores being able to incorporate new digital features from no cashier shops, using mobile phones to navigate the aisles to specific products and being able to virtually try on clothes without removing them from the rail. Furthermore, 5G will enable quicker returns, deliveries and better stock management. Retailers will also increasingly be able to use data to offer us products we are more likely to want to purchase. ‘Smart’ shelf displays will be adapted to our tastes, pricing can be updated in real time and can show instant product availability. For industries such as manufacturing, 5G will enhance capabilities of augmented reality and artificial intelligence in factory settings allowing for optimised performance, productivity and lower manufacturing costs. It was also enable network slicing so manufacturers can operate on private 5G networks to securely adapt factories to meet changing demands and business needs. In the creative industries, 5G will allow for more immersive experiences. 5G can also help to future proof the rural economy with 5G enabled remote working allowing rural residential access to better jobs and training. Tourism can be enhanced through new methods of engaging visitors. Farming practices can also be enhanced through new technologies which are supported by 5G.

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

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

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

#### **Education:**

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

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

#### **Health:**

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

5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Ofcom's Online Nation Report (published in November 2024) found that Sixty-nine per cent (32.5m) of UK online adults visited one of the top ten health and wellbeing websites or apps in May 2024, up from 66% for the same sites the previous year. The nhs.uk website was the highest-reaching NHS-owned site or app, reaching 47% (22.5m) of UK online adults, followed by the NHS app, visited by 21% (10.0m) of UK online adults in May 2024. Fifty-eight per cent (23.0m) of adults in England visited NHS-owned sites or apps in May 2024, 53% (1.1m) in Wales, 39% (1.5m) in Scotland and 35% in Northern Ireland. By some distance, the NHS was the highest-reaching health and wellbeing online service provider, with 56% of UK online adults (26.5m) visiting either the NHS.uk website or NHS-owned apps in May 2024, a considerable lead on the next-

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most-visited service, US-based health information provider Healthline (14%). The use of NHS online services peaked in December 2021, as the Covid19 Omicron variant spread rapidly and the NHS Covid Pass became mandatory in settings such as hospitality venues in England reaching 81% (38.4m) of UK online adults. With the roll-out of the Covid-19 vaccines and easing of restrictions, reach declined in 2022 and stabilised in 2023 (monthly average: 25.6m). Ofcom's Technology Tracker survey found that 69% of internet users aged 16+ go online to book and/ or access healthcare services; the 35-44 age group was the most likely to do this (78%), while those in the DE socio-economic group were the least likely (53%). Fifty-five per cent of internet users aged 16+ use online services for personal health or fitness/lifestyle monitoring, and those in the AB socio-economic group are more likely to do this than those in the DE group (70% vs 38%). Ofcom's Adults' Media Literacy Tracker found that 76% of adults used apps or websites for wellbeing. This included using them to relax (40%), to look up health symptoms (32%) or to 'improve your mood or feel happy' (30%).

## Summary

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

This development proposes improved coverage to the surrounding area including the introduction of new 5G coverage for VMO2.

There is a clear and demonstrable requirement for improved electronic communications services. Due consideration has been given to all practicable solutions for providing the required telecommunications service and this proposal has been designed in such a way as to minimise its overall visual impact upon the local area by ensuring the services can be provided from a single site, with any minor negative impact outweighed by the benefits of providing a high quality electronic communications services which caters for coverage and capacity and allows for reasonable future expansion as acknowledged as acceptable within the NPPF.

The proposal represents an appropriate siting and design solution for this area, balancing environmental and planning considerations. A simple design solution is proposed to mitigate visual impact and prevent significant harm to the local environment. The minimal impact of replacing and upgrading the existing development would be outweighed by the significant public benefits of providing improved coverage to the area.

The proposed development is compliant with the relevant policies from the NPPF, and local planning policies as outlined within this supporting statement. The proposal is

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fully compliant with ICNIRP guidelines and declaration of compliance has been provided.

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

### Confirmation that submitted drawings have been checked for accuracy

Name: (Agent)	Veronica Raescu on behalf of Rob Sinclair	Telephone:	Redacted
Company:	Sinclair Dalby Ltd		
Company Address:	3 Princes Street, Bath, BA1 1HL	Email Address:	Redacted
Signed:	Redacted	Date:	14 <sup>th</sup> November 2025
Position:	Director	(on behalf of Cornerstone)	

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