SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Moorlands Avenue SW	Site Address:	MOORLANDS AVENUE SW, MOORLANDS AVENUE, DEWSBURY, WEST YORKSHIRE, WF13 2JZ
NGR:	E: 424065, N: 421988		
Site Ref Number:	JET 219	Site Type: Macro	SW – 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:	**17th July 2026**	
Name of contact:	**N/A**	

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

Summary of outcome/Main issues raised: A written pre-application consultation response was received from Kirklees Council on 17 July 2026. The Local Planning Authority's principal concerns related to the proposal's proximity to an existing telecommunications installation and the potential for telecommunications clutter and associated visual impact within the streetscene. The Officer also raised concerns regarding the proposed footpath build-out and its potential implications for pedestrian movement, questioning whether an alternative siting arrangement could be achieved. In addition, the Officer recommended that further consideration be given to alternative sites and mast sharing opportunities in light of the existing telecommunications installation nearby. Following receipt of the pre-application response, the Applicant engaged positively with the Local Planning Authority and offered a Microsoft Teams meeting to discuss the Officer's concerns and the technical constraints influencing the site selection. Whilst no meeting ultimately took place, the Applicant has carefully considered the comments received. The submitted Planning Statement, Sequential Site Assessment, Arboricultural Impact Assessment, supporting drawings and photomontages have been prepared having regard to the issues raised during the pre-application process and demonstrate why the proposed site remains the optimum and most appropriate solution.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:			Amber	
Consultees:-	On July 13th 2026: iqbal.mohamed.mp@parliament.uk & eric.butterworth@kirklees.gov.uk graham.france@kirklees.gov.uk maciej.kapsa@kirklees.gov.uk were offered pre-application consultation.			
Summary of outcome/Main issues raised:	N/A			

School/College

Location of site in relation to school/college:

No schools near this site
Outline of consultation carried out with school/college: NA
Summary of outcome/Main issues raised: N/A

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**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		**No**
Details of response: The proposal is significantly further than 3km away from an aerodrome or airfield.		

Developer's Notice

Copy of Developer's Notice enclosed?	**Yes**	
Date served:	**26th July 2026**	

3. Proposed Development

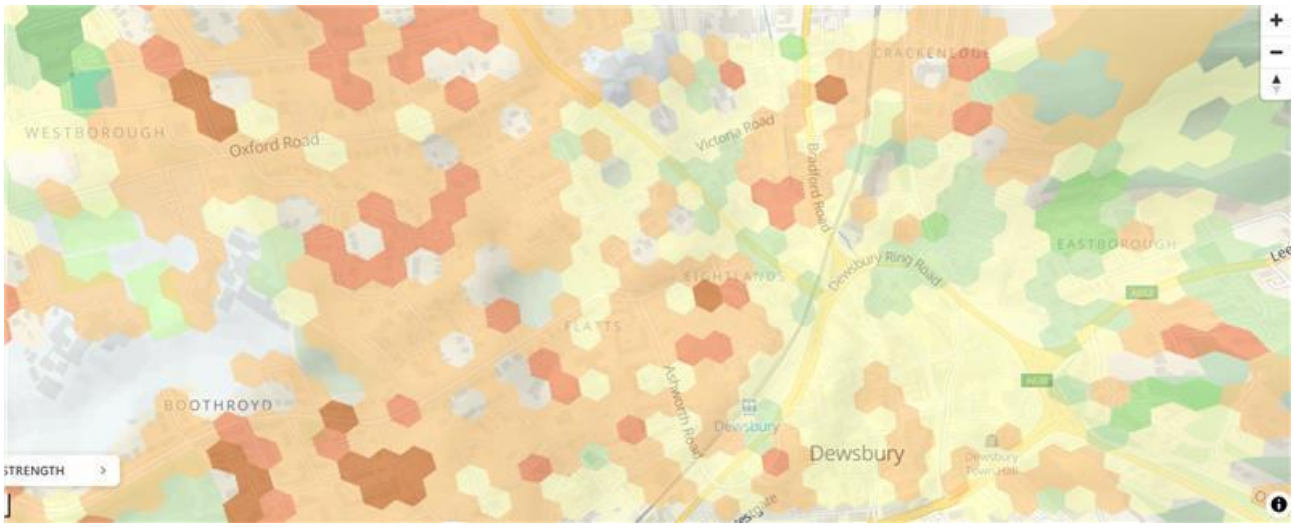
The proposed site:
This Planning Statement has been prepared on behalf of Jet Infrastructure in support of a proposed telecommunications installation required to address a critical gap in network coverage and capacity within the Moorlands Avenue area of Kirklees**.** The proposal will deliver upgraded service and enhanced coverage capacity for VMO2 customers, and is required due to the inability to upgrade the existing site. It also forms part of a targeted network improvement programme aimed at enhancing existing 4G service and introducing 5GSA capability to meet rising consumer demand, improve coverage and deliver increased network capacity.

The proposal forms part of the permanent network solution following the loss of the former VMO2 installation, which ceased to be available following redevelopment of the previous site. Whilst a temporary installation was deployed under emergency permitted development rights to maintain continuity of service, this was never intended to provide a permanent engineering solution.

Following the loss of the former installation, the Operator undertook a comprehensive radio-planning assessment to determine the optimum long-term network arrangement. That assessment concluded that, owing to the operational characteristics of modern 4G and 5G technologies and the identified coverage objectives, the former coverage cell could no longer be effectively replicated by a single replacement installation.

The proposed Moorlands Avenue installation forms one part of that permanent network solution. It has been identified through detailed radio-planning analysis as the optimum location from which to serve this search area, balancing the operational requirements of the network with planning, environmental and engineering considerations.

As part of VM02s continued network improvement program, there is a specific requirement for a new base station installation at this location to improve coverage and capacity to the area. Currently, VM02 customers have limited coverage and capacity in this area. Network 'capacity' is an increasing challenge in densely populated urban areas where there is exponential growth in demand for data services to facilitate data hungry applications and devices. While 'coverage' may be present, the network has insufficient 'capacity' to handle the volume of user traffic and so calls are dropped and data based applications continuously buffer without being usable. This can be seen in the crowdsourced data below:



A new ground-based installation is consequently required to provide the necessary 4G and 5G capacity and coverage improvements. The proposed installation at Moorlands Avenue provides a purpose-designed structure capable of safely accommodating the required equipment whilst achieving the necessary operational height and meeting the radio-planning requirements of the network.

Great effort has gone into finding a location that minimises impact while delivering improvement of service.

VMO2 must consequently identify a suitable installation within this search area if the required enhanced 4G and new 5G coverage and capacity are to be delivered effectively. A new ground-based installation is required which can safely accommodate the necessary equipment whilst achieving the antenna height and radio propagation characteristics necessary to serve the identified target area.

Great care has been taken in identifying the proposed Moorlands Avenue site. The search area is constrained by dense residential development, the presence of existing highway infrastructure, underground services, mature trees, and operational and technical requirements associated with delivering enhanced 4G and 5G coverage. A comprehensive assessment of alternative locations has therefore been undertaken, with the selected site representing the most appropriate technically viable solution capable of meeting the identified network requirement.

The proposed site has been carefully positioned within an established highway corridor to minimise effects on residential amenity whilst making effective use of an existing infrastructure setting. The accompanying Sequential Site Assessment demonstrates that alternative locations were carefully considered but discounted due to a combination of technical, operational, environmental and planning constraints. Furthermore, the accompanying Arboricultural Impact

Assessment confirms that the proposal can be implemented without the removal of any existing trees, with the retained mature tree belt continuing to provide an attractive backdrop to the development and preserving the established character of the streetscene. As is evidenced by the accompanying photomontages, the proposal integrates successfully with the existing pattern of highway infrastructure and surrounding vegetation. The selected Moorlands Avenue site therefore represents the most appropriate balance between delivering the necessary enhanced digital connectivity whilst minimising effects upon the character and appearance of the area and the amenity of nearby residents.

The proposal will facilitate enhanced digital connectivity and support the continued rollout of advanced telecommunications infrastructure, delivering significant socio-economic benefits to residents, businesses and visitors within the area. This proposal will deliver standalone 5G technology and increase coverage and introduce the latest technologies to the area for the applicant in line with local and national policy.

National planning policy and Government objectives have similarly continued to place increasing emphasis on the importance of modern digital communications infrastructure. Recent Government consultations have sought to further support and streamline the delivery of telecommunications development through amendments to both the GPDO and the National Planning Policy Framework, reflecting the growing recognition of the critical role that digital connectivity plays in supporting economic growth, productivity and social inclusion.

Site Location

5G radio technologies operate in higher radio frequency bands than previous technologies and these higher frequencies do not propagate as far, while also experiencing greater signal loss and interference from obstacles such as buildings and vegetation. As a result, 5G infrastructure must be located sufficiently close to the identified area of network demand and at an appropriate height to provide effective coverage and capacity.

The Moorlands Avenue search area presents a challenging environment in which to accommodate modern telecommunications infrastructure. It comprises predominantly low-rise residential development, mature highway trees, allotments, existing highway infrastructure, underground utility services and other operational and engineering constraints that substantially limit the number of locations capable of delivering the required 4G and 5G coverage whilst satisfying radio planning, engineering, highway and amenity requirements.

A further challenge is relevant here given the topography of the local area. This is quite an undulating urban area where the landform rises and drops predominantly north to south. Topography has a significant impact upon radio propagation as radio frequency cannot 'see' through the land form and so must be in the most elevated location to deliver service over a wider

distance. Siting in an area of low elevation means that the service cannot travel far and is very localised – this would necessitate a significantly larger volume of sites to provide the same level of coverage, which would be contrary to Planning Policy and Guidance advocating keeping site numbers to a minimum.

It is felt this proposed location was suitable to service the area from as it is in the defined search area created by the loss of the previous NTQ site, it is close enough to the previous site so that it can provide replacement service in the context of the limitations of 5G, is in an area of reasonably elevated landform to ensure the service can propagate over a large area to minimise the number of sites requited to replace the previous site and, perhaps most significantly, it is outside the designated Conservation Area to the south and sufficient distance that it's setting Is not impacted.

The proposed site occupies an existing footpath and grass verge on Moorlands Avenue adjacent to the Moorlands Avenue Allotments. The location has been carefully selected following a comprehensive assessment of alternative sites and provides the optimum balance between operational performance and planning considerations. The adjoining allotments introduce a greater sense of openness within the streetscene and enable the infrastructure to be positioned within an established highway corridor, avoiding many of the more constrained residential locations identified during the sequential site assessment.

The proposal comprises a 20m Orion streetworks monopole supporting six antennas. The proposed height represents the minimum necessary to achieve the required radio propagation and network performance, taking account of surrounding buildings, mature vegetation and other sources of physical clutter that influence signal transmission.

Throughout the site selection process, particular regard has been given to minimising impacts upon residential amenity. Many alternative locations would position the required infrastructure in closer proximity to residential frontages, reduce pedestrian space, conflict with existing highway infrastructure or be constrained by underground services. Other locations were discounted due to engineering, operational or radio planning limitations, whilst existing infrastructure in the area is incapable of accommodating the additional equipment required to deliver the identified network improvements. The accompanying Sequential Site Assessment provides a detailed explanation of these constraints.

The accompanying Arboricultural Impact Assessment confirms that the proposal can be implemented without removing any existing trees. Limited Root Protection Area encroachment will be mitigated through BS5837-compliant 'no-dig' construction methods, ensuring the retained mature trees continue to provide an attractive backdrop to the proposed development.

As demonstrated by the accompanying photomontages, the proposed monopole is experienced within an established streetscene containing existing highway infrastructure, overhead telecommunications equipment, mature trees and other vertical features. Whilst the upper

section of the monopole will remain visible, it is read within this existing infrastructure corridor rather than as an isolated feature. The photomontages further demonstrate that the proposal integrates successfully with its surroundings and that the degree of visual change is proportionate to the substantial public benefits arising from the provision of enhanced digital connectivity.

The Local Planning Authority's pre-application response raised concerns regarding the proximity of the proposal to an existing telecommunications installation and the potential for visual clutter. Those comments have been carefully considered throughout the evolution of the proposal. The submitted scheme demonstrates that the selected location represents the optimum solution available within the search area, balancing operational requirements with visual, highway, arboricultural and residential considerations whilst consolidating telecommunications infrastructure within an established highway corridor rather than dispersing new installations across a wider residential area.

Accordingly, the selected location represents the least harmful and most appropriate viable solution identified within this constrained search area, appropriately balancing the operational requirement for enhanced 4G and 5G connectivity against residential, visual and heritage considerations.

Design

The height of the monopole at 20 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 due to radio propagation constraints and signals being blocked by surrounding ‘clutter’ in the form of the surrounding built and natural environment.

Modern 5GSA service is provided via higher frequency radio spectrum. This is helpful in that it can deliver low latency, high speed and high capacity data transfer required to service modern applications, sensors and devices, however, this spectrum does not propagate as far nor propagate through materials (like trees or buildings) as well as lower frequency spectrum utilised by previous generations. This directly impacts and advises the necessary height, design and siting to overcome that constraint.

As a result, 5G requires taller structures to achieve the same level of coverage footprint.

It is felt that this slimline streetworks pole design is the most sensitive that could be used. It is necessary to have this type of design that would be structurally capable of hosting the antennas at the necessary height while also being the most slimline pole possible.

The use of this pole, capable of supporting antennas at this height to maximise radio propagation and, subsequently the coverage footprint, reduces the need for additional masts in

the surrounding area that may have been required if the antennas were at a lower height. The height also ensures ICNIRP compliance and so this 20m height is the lowest height that is viable.

The mast is proposed grey colour – this was intentional to minimise contrast against the typically a grey sky backdrop it will be viewed against.

Acknowledging the subjective nature of colour preference, if the Council feel the pole and antennas of the proposal would assimilate better if the site was coloured differently to assist assimilation and reduce contrast then please advise ASAP and we will be happy to amend the submitted drawings to reflect that. Conditions cannot be attached to applications for prior approval but any consent would come with a statutory condition that the development must be built as per the details submitted so a change of annotation in the drawings pre-decision would ensure the Council have sufficient control of this and it is an amendment we are happy to make if the Council feel that is the most sympathetic colour.

The antennas have been placed in a very narrow aperture in a stacked format (5G antennas at the top and 4G antennas below) to negate bulk and width to keep the width as streamlined and slimline as possible. GRP shrouding of antennas cannot be used on modern deployments as it obstructs 5G frequency propagation and also acts as a sail, with the greater surface area catching the wind, putting significantly more structural pressure on the pole from wind loading. Below the antennas are remote radio units required to maintain high quality service – these must be adjacent to the antennas as increased feeder length causes signal degradation. Between the antenna and remote radio apertures there is banding to merge the apertures and keep it appearing streamlined, unfussy and uncluttered.

There are three cabinets/equipment housing at the base – these share a foundation and are tightly packed beside each other – this is done to minimise impact by negating a sprawl of cabinets in the streetscene that can be seen in other deployments. The are also very narrow to minimise streetscene impact. The cabinets are of green colour as it helps assimilate with existing and this typically blends with soft landscaping in the area. The layout has also been designed to maintain pedestrian permeability through the incorporation of an additional section of footway around the installation, reflecting the placemaking and inclusive design objectives of Policy LP24.

These efforts to minimise contrast at the various heights is advocated at Paras 28 & 40 of the Government Code of Practice…

"Mitigating visual impacts: when possible, operators should look to use sympathetic designs, materials and colour (including camouflage where appropriate) to ***minimise the contrast between infrastructure and the area****."*

"Colouring and camouflage: where appropriate, ***masts should be coloured to match their backdrop to minimise contrast*** *in an urban or rural setting."*

For all these reasons, the slimline streetworks monopole design is the most suitable design in this particular circumstance.

The improved digital connectivity also aligns with the Government's Wireless infrastructure Strategy, Planning and Infrastructure Bill, 10 Year Infrastructure Strategy and the NPPF, all of which promote digital connectivity infrastructure given the significant social and economic benefits it delivers locally, regionally and nationally.

The principal aim of the development is to enhance VMO2's mobile broadband network coverage and capacity. Businesses, commuters, workers, visitors and residents all depend upon high quality network service to facilitate use of data-hungry applications on their phones and other devices. These applications carry significant socio-economic benefit, all underpinned by the connectivity provided by infrastructure such as the proposal.

Enclose map showing the cell centre and adjoining cells:

VMO2's ongoing network improvement programme is in line with Government aspirations.

This area requires additional coverage and capacity to handle the volume of data traffic accessing the network via devices and phones. It also requires upgrade to the latest technology and service, and to provide the appropriate continuity of service sought by the replacement of the now removed site.

As demonstrated, there are dense residential streets and cul-de-sacs that do not benefit from the amenity safeguards demonstrated in the previous section and would most certainly be more impactful than the proposal – this in itself demonstrates that the best and most appropriate viable siting and design options have been proposed.

Given the network performance issue evidenced above, there is a specific requirement for a new base station installation (the proposal). This additional site will allow upgraded service to be delivered with improved coverage and capacity across the surrounding area.

Type of Structure

Description:

A proposed new 20m high slimline Orion streetworks monopole supporting 6 no. antennas and 6 no. ERS radio units, together with equipment housing and associated ancillary development.

The installation has been designed to support both 4G and 5G technologies. For full technical specifications and layout, please refer to the enclosed drawing package.

Overall Height:	+20m AGL
Height of existing building	N/A
Equipment Housing:	

Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	Pole painted 'Light Grey' (RAL 7035) with grey antennas (as noted, happy to amend colour depending upon LPA preference).
Equipment housing – type of material and external colour:	Steel equipment cabinets coloured 'Fir Green' (RAL 6009)

Reasons for choice of design:

This is discussed at length in the previous section of this document – to negate unnecessary duplication this will not be repeated but please reference the detail discussed previously.

The NPPF and Code of Practice encourages site sharing and the efficient use of existing telecommunications infrastructure. However, within the defined search area, there are no existing base stations that are capable of being shared to provide this new service.

Policy also advocates the use of buildings where possible, however, the buildings in the search area do not provide sufficient height. In any case, their nature as dwellings or immediately surrounding dwellings mean that the rooftops would not be suitable structurally or aesthetically.

The latest 5G service is delivered via higher frequency radio. This higher frequency is fantastic in that it can deliver high speed data services required for modern applications, however, it has the negative in that higher frequency does not propagate as far as lower frequencies used in previous generations, nor do the radio waves propagate through 'clutter' as well meaning that signal is blocked easily. ICNIRP exclusion zone is also typically larger. This necessitates antennas to be hosted higher to ensure ICNIRP compliance, so the radio frequency can propagate as far as is possible to maximise coverage footprint and so that there is line of sight above 'clutter' that would block the signal propagation.

All in all it is felt that that this proposed design strikes the best balance in terms of technical necessity to overcome technical constraints and minimising visual impact by keeping the height to an operational minimum, clearing the built and natural surroundings to assist radio propagation to minimise the need for additional sites in the area and by utilising a colour finish that will minimise contrast when viewed adjacent the typical grey sky, though we are happy to amend the colouring to match what the authority deemed appropriate.

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.

The technical constraints that dictate and inform this siting and design are discussed at length throughout Government's 'Code of Practice for Wireless Network Development in England' Planning Guidance document (attached to this application).

4. Technical Information

ICNIRP Declaration attached 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.	**Yes**	

5. Technical Justification

Reason(s) why site required

In the UK, mobile network operators (MNOs) such as EE, VodafoneThree and VMO2 operate under a regulatory framework primarily controlled by Ofcom on behalf of UK Government. Their obligations arise from two main legal mechanisms:

- Wireless Telegraphy Act spectrum licences (for use of radio frequencies).
- General Conditions of Entitlement under the Communications Act 2003 (for provision of electronic communications networks/services).

Through the Spectrum Licence Obligations (Wireless Telegraphy Act 2006) mobile operators require licences from Ofcom to use radio spectrum, which is essential for operating mobile networks.

Key obligations typically include the use of allocated spectrum that must be used within specific frequency bands, power limits, emission standards and interference controls.

These conditions ensure efficient spectrum use and prevent interference. These radio spectrums are governed by the laws of physics but one spectrum/frequency will have different principles to another. Each Network Operator is licenced to use different spectrum and this is why what may be suitable siting for one operator may not be suitable for another. This directly influences potential siting opportunities for masts.

Perhaps most significantly, these licences are issued with coverage and network performance obligations. This will include things like roll-out or coverage requirements, minimum population

coverage or geographic coverage requirements for rural areas. Obligations linked to specific technologies or generations like 5G.

Operators must provide data to Ofcom on network performance and demonstrate compliance with coverage and network performance milestones to demonstrate they have met their licence obligations.

Additionally, under the General Conditions of Entitlement (Communications Regulation) any operator providing public electronic communications networks or services must comply with Ofcom's General Conditions.

This means that, amongst other things, Operators must enable and maintain network integrity and resilience, and ensure access to emergency services.

If an Operator does not comply with these requirements then Ofcom, on behalf of UK Government, can issue substantial fines, withdraw spectrum or even cancel an Operators licence.

This is relevant to the proposal because...

1. The spectrum allocated, and the physics associated, directly impacts the siting options for the Operators.

2. The Operators must find a means of providing this service locally through the siting of a mast. While Operators will obviously want to provide the best service they can to their Customers, it goes beyond this in there is an actual legal obligation to provide this area with the most up to date 5G service with sufficient coverage and capacity to deliver quality network performance.

The NPPF then requires that operators find an acceptable or the least impactful means of providing that service, minimising the impact while acknowledging the technical constraints. The proposal is permitted development (albeit 'with prior approval') so the principle of the development is established in law via Part 16 of the GPDO. This is an important distinction as under permitted development a solution must be found as consideration cannot be given to the principle, only that the proposal is acceptable or the most suitable option in terms of siting and appearance.

This is significant in an area as constrained as this, especially when such careful consideration has been given to siting and design to minimise impact while remaining functional and addressing the technical constraints.

Under the terms of its licence with UK Government (controlled via Ofcom on Governments behalf), Virgin Media O2 Limited (VMO2) are required to meet strict service obligations, ensuring that the benefits of mobile connectivity are extended to all communities, including those currently underserved.

This installation is required to provide improved 4G coverage and brand new 5G coverage for VM02 in Kirklees, addressing existing gaps in service coverage, adding additional capacity and improving overall network performance in the locality.

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. Proposing this installation too far from the intended coverage area will leave parts of the target service area 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 Moorlands Avenue area of Kirklees, 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 best practice guidance, 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.

VMO2 were previously on a site at the old College building that had to be removed due to redevelopment. Due to the limitations of 5G it is important that the site is as close to what it is replacing so the new site can fit into the existing cell network. As no other suitable existing telecommunications sites were identified that could accommodate the extent of equipment required for this proposal, a new installation is required. There are no existing buildings that can be used. Of those buildings with sufficient height in the area, they are of timber frame pitched roof design and construction, unsuitable for the requirements of telecommunications

development, and or are too low in height or elevation to produce the required service provision from their locations.

The local urban environment presented further constraints. Beyond the immediate vicinity of the proposed site, the search area is characterised by a combination of predominantly residential streets and cul-de-sacs, the nearby Northfield conservation, highway corridors and areas constrained by existing underground utility infrastructure. Residential development forms a significant proportion of the search area, where surrounding streets are characterised by established dwelling frontages and direct residential outlook.

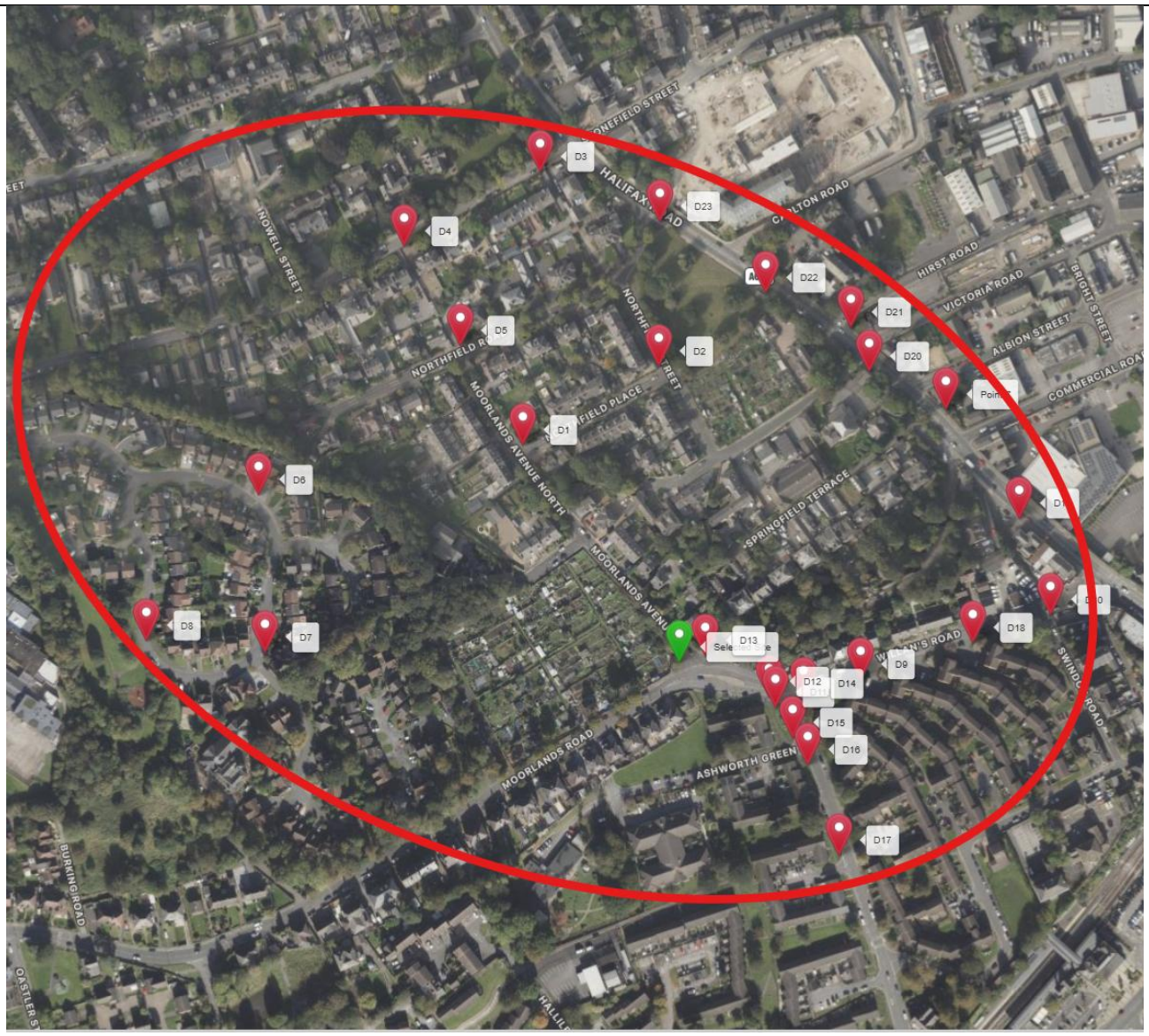
The proposed site occupies an existing grass verge and pavement adjacent to the Moorlands Avenue Allotments, providing a comparatively open setting within an established highway corridor. As demonstrated by the accompanying photomontages, the proposal is experienced alongside existing street lighting, overhead telecommunications infrastructure, highway features and mature vegetation, enabling it to integrate successfully within the existing streetscene.

Many alternative streetworks locations would position the required infrastructure in closer proximity to residential properties, conflict with underground services, reduce available footway widths or fail to satisfy operational and radio planning requirements. Existing infrastructure in the area is also incapable of accommodating the additional equipment required to deliver the identified network improvements.

Accordingly, the selected Moorlands Avenue site represents the most appropriate and least harmful technically viable option identified within this constrained search area, balancing operational requirements with visual, highway, arboricultural and residential considerations.

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

Pindrop Key: **Green** = Selected Site **Red** = Discounted Option
Redline = Search Area



Site	Address	NGR	Reasons for discounting
D1 - Streetworks	Northfield Place, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JS, United Kingdom	E: 423962 N: 422129	The following site was considered as a potential location for the proposed installation but has been discounted. This option is located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to

			adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D2 - Streetworks	Northfield Street, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JU, United Kingdom	E: 424051 N: 422181	The following site was considered as a potential location for the proposed installation but has been discounted. This option is located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation

			and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D3 - Streetworks	Oxford Road, Westborough, Northorpe, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 4LL, United Kingdom	E: 423972 N: 422308	The following site was considered as a potential location for the proposed installation but has been discounted. This option is located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.

D4 – Streetworks	Oxford Road, Westborough, Northorpe, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 4LL, United Kingdom	E: 423883 N: 422259	The following site was considered as a potential location for the proposed installation but has been discounted. This option is located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D5 - Streetworks	Northfield Road, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JS, United Kingdom	E: 423920 N: 422194	The following site was considered as a potential location for the proposed installation but has been discounted. This option is located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the

			prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D6 - Streetworks	Chadwick Crescent, Daw Green, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JF, United Kingdom	E: 423788 N: 422096	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen

			site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D7 - Streetworks	Chadwick Crescent, Daw Green, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JF, United Kingdom	E: 423793 N: 421993	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.

D8 - Streetworks	Chadwick Crescent, Daw Green, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JF, United Kingdom	E: 423715 N: 422000	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D9 - Streetworks	Barber Walk, Eightlands, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2PN, United Kingdom	E: 424184 N: 421977	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of

			development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D10 - Streetworks	Swindon Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2PA, United Kingdom	E: 424309 N: 422020	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-

			distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D11 - Streetworks	Moorlands Road, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JW, United Kingdom	E: 424128 N: 421958	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D12 - Streetworks	Moorlands Road, Flatts, Boothroyd, Dewsbury,	E: 424124 N: 421966	The following site was considered as a potential location for the proposed installation but has been discounted.

	Kirklees, West Yorkshire, England, WF13 2JP, United Kingdom		This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D13 - Streetworks	Moorlands Road, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2JP, United Kingdom	E: 424082 N: 421992	This location lies in close proximity to an existing telecommunications installation operated by another network provider. The proposed installation could not be accommodated whilst satisfying the Operator's engineering design requirements and the necessary compliance assessments undertaken as part of the detailed site design process. The location is therefore not technically viable. Additionally, the site is facing front facing residential windows on the opposite side of

			Moorlands Avenue, representing a more impactful location than the selected, which by comparison has been site to avoid direct views from front facing windows. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D14 - Streetworks	Wellington Walk, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2PQ, United Kingdom	E: 424147 N: 421964	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D15 - Streetworks	Ashworth Green, Flatts, Boothroyd,	E: 424140 N: 421939	The following site was considered as a potential location for the proposed installation but has been discounted.

	Dewsbury, Kirklees, West Yorkshire, England, WF13 2LD, United Kingdom		This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D16 - Streetworks	Ashworth Road, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2NJ, United Kingdom	E: 424150 N: 421921	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of

			development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D17 - Streetworks	Ashworth Road, Flatts, Boothroyd, Dewsbury, Kirklees, West Yorkshire, England, WF13 2NJ, United Kingdom	E: 424171 N: 421862	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the

			development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D18 - Streetworks	Elim Walk, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2PH, United Kingdom	E: 424258 N: 422001	The following site was considered as a potential location for the proposed installation but has been discounted. This option is situated within a predominantly residential area, where the introduction of a new telecommunications installation would appear more prominent within the streetscape and have a greater potential to affect the amenity of nearby residential properties. The surrounding environment is characterised by residential dwellings and a more domestic scale of development, making it a less suitable location for new telecommunications infrastructure. Furthermore, this location does not benefit from the mature tree cover and the backdrop of the adjacent allotments that assist in integrating the proposed installation at the selected site. The chosen site is naturally screened by existing vegetation and benefits from a softer visual setting, reducing the prominence of the development in both short and longer-distance views. By comparison, the discounted option would appear more exposed within the residential streetscape, resulting in a greater visual impact. Consequently, the selected site represents the more appropriate and less visually intrusive location for the proposed installation.
D19 - Streetworks	Qamar Solicitors,	E: 424288 N: 422083	This location exhibits numerous surface utility chambers, pavement scarring and

		Spinkwell Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2NX, United Kingdom		evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities. As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. This location also lies approximately 15 metres below the elevation of the selected site and is therefore incapable of delivering the required radio propagation characteristics. The lower topographical position would increase signal obstruction from surrounding development and mature vegetation, limiting coverage and reducing network resilience. Achieving the required service objectives from this location would likely necessitate a significantly taller structure or additional sites, resulting in greater visual impact and infrastructure proliferation. By contrast, the naturally elevated selected site enables the required 4G and 5G coverage to be achieved using the minimum operational height whilst representing the more efficient and sustainable engineering solution.

D20 - Streetworks	The Bath Hotel, 18, Halifax Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2AL, United Kingdom	E: 424189 N: 422178	This location exhibits numerous surface utility chambers, pavement scarring and evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities. As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. This option is also located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation

			helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D21 - Streetworks	The Bath Hotel, 18, Halifax Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2AL, United Kingdom	E: 424177 N: 422207	This location exhibits numerous surface utility chambers, pavement scarring and evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities. As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. This location also lies approximately 10 metres below the elevation of the selected site and is therefore incapable of delivering the required radio propagation characteristics. The lower topographical position would increase signal obstruction from

			surrounding development and mature vegetation, limiting coverage and reducing network resilience. Achieving the required service objectives from this location would likely necessitate a significantly taller structure or additional sites, resulting in greater visual impact and infrastructure proliferation. By contrast, the naturally elevated selected site enables the required 4G and 5G coverage to be achieved using the minimum operational height whilst representing the more efficient and sustainable engineering solution.
D22 - Streetworks	Halifax Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2BS, United Kingdom	E: 424121 N: 422230	This location exhibits numerous surface utility chambers, pavement scarring and evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities. As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. This option is also located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent

			visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.
D23 - Streetworks	Halifax Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2BS, United Kingdom	E: 424051 N: 422276	This location exhibits numerous surface utility chambers, pavement scarring and evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities.

				As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. This option is also located within the Northfields Conservation Area and is situated in a predominantly residential environment. The introduction of a new telecommunications installation at this location would result in a more prominent visual feature within a sensitive heritage setting, where the prevailing character is defined by traditional residential properties, mature street trees and historic townscape. The proposal would therefore have greater potential to adversely affect the character and appearance of the Conservation Area. In addition, unlike the selected site, this location does not benefit from the natural screening and visual containment provided by the mature tree cover and the backdrop of the Northfields Allotments. The chosen site is better assimilated into its surroundings, with existing vegetation helping to soften views of the installation and reducing its visual prominence from the public realm. By comparison, the discounted option would appear more exposed within the residential streetscape and would result in a greater visual impact on nearby residential properties and the wider Conservation Area. Accordingly, the selected site represents the more appropriate and less visually intrusive solution.

D24 - Streetworks	The Bath Hotel, 18, Halifax Road, Eightlands, Batley Carr, Dewsbury, Kirklees, West Yorkshire, England, WF13 2AL, United Kingdom	E: 424239 N: 422154	This location exhibits numerous surface utility chambers, pavement scarring and evidence of previous excavation works, indicating a significant concentration of underground statutory undertakers' apparatus. The presence of extensive underground services would substantially constrain the design and construction of the proposed telecommunications infrastructure, increasing engineering complexity and the risk of conflict with existing utilities. As such, the location is not considered technically viable from a design and build perspective. By comparison, the selected site provides a more suitable engineering solution with fewer anticipated underground constraints, allowing the required infrastructure to be delivered more efficiently and with reduced construction risk. Additionally, this location lies approximately 10–20 metres below the elevation of the selected site and is therefore incapable of delivering the required radio propagation characteristics. The lower topographical position would increase signal obstruction from surrounding development and mature vegetation, limiting coverage and reducing network resilience. Achieving the required service objectives from this location would likely necessitate a significantly taller structure or additional sites, resulting in greater visual impact and infrastructure proliferation. By contrast, the naturally elevated selected site enables the required 4G and 5G coverage to be achieved using the minimum

				operational height whilst representing the more efficient and sustainable engineering solution.	

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

N/A

7. Additional Relevant Information

Environmental information:

The proposed site is not located within a designated heritage or environmental designation. Whilst the nearby Northfield Conservation Area has informed the site selection process, the selected site lies outside its boundary. The proposal is located adjacent to mature trees; however, the accompanying Arboricultural Impact Assessment concludes that the development can be implemented without the removal of any existing trees and with only negligible arboricultural impacts through the use of appropriate mitigation measures.

Land use planning designations:

The site is located in the settlement limit.

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 and balances the need and socio-economic benefits against perceived, or identified, harm.

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.

Legislation
The proposal constitutes permitted development with prior approval.

This means that the proposal is deemed acceptable in principle via Part 16 of the GPDO. As such, the principle of the development is not in question – just an assessment on the acceptability of the proposal in terms of siting and appearance.

The Local Development plan can be given limited weight in the determination of an application for prior approval – it is certainly not a determinable factor.

The development plan does not have the statutory primacy it has for full planning applications. Relevant development plan policies can be material considerations, but they do not bind the decision maker and cannot be determinative – this proposal is actually permitted development where the principle of the development is accepted in law (even in designations such as public open space or green belt).

Planning Policy and Local & Regional Strategy

Policy LP24 (Design) of the Kirklees Local Plan seeks to ensure that development delivers high-quality, well-designed places which respond positively to local character whilst creating safe, attractive and accessible environments. The policy places particular emphasis on achieving development that integrates successfully with its surroundings, maintains the quality and functionality of the public realm, and provides an inclusive environment for all users. The proposed development has been carefully designed having regard to these objectives, balancing the operational requirements of the telecommunications network with the need to minimise visual impacts, retain pedestrian accessibility and integrate successfully within the existing streetscape.

It is a Strategic goal of Kirklees Council, the Leeds City Region Enterprise Partnership and the West Yorkshire Combined Authority to be digitally connected.

This is being achieved via the 'Kirklees Inclusive Economy Strategy 2025' and the 'Leeds City Region Strategic Economic Plan 2016 – 2036' as well as initiatives like the Superfast West Yorkshire and York scheme. Through these initiatives the Council, City Region Partnership and Combined Authority has identified the following priorities and goals:-

"The Inclusive Economy Strategy covers the period from 2025-2030. It sets out a vision, objectives and high-level priorities for action under three main themes:

...investing in our diverse Places and the physical and digital connections between them to increase access to job opportunities for Kirklees residents, widen the talent pool for local businesses and ensure that Kirklees remains a fantastic place to live, work and do business."

"The Industrial Strategy identifies eight growth-driving sectors, as well as enabling foundational industries, supported by Sector Plans. These are:

1. Advanced manufacturing
2. Creative industries
3. Life sciences
4. Clean energy
5. Defence
6. Digital and technologies
7. Professional and business services

8. Financial services."

"Building on this framework, we have identified three simple objectives to achieve progress towards a more inclusive economy in Kirklees:

...investing in our diverse Places and the physical and digital connections between them to increase access to job opportunities for Kirklees residents, widen the talent pool for local businesses and ensure that Kirklees remains a fantastic place to live, work and do business."

Thriving rural communities

We will ensure we support thriving rural areas served by gigabit connectivity and high-quality public transport services.

Supporting a mixed economy including agriculture but also cultural businesses and others taking advantage of high-quality digital connectivity.

Kirklees contains many small rural communities. Each of these has a role to play in the wider productivity of Kirklees. Physical and digital connectivity supports this.

Rural communities are often more car-reliant than urban ones. Providing high quality bus services will reduce this while world class digital connectivity will reduce the need for journeys to the office or to meet with clients in person whether close by or far afield.

While our rural areas are generally more affluent than our major towns, maintaining good connectivity contributes to older people and those with limited mobility being able to take advantage of all Kirklees has to offer.

Additionally, the Leeds City Region (which Kirklees is a partner) Economic Strategy defines digital infrastructure as a key priority:-

PRIORITY 4: INFRASTRUCTURE FOR GROWTH

PRIORITY 4 SUMMARY	
AIM	To build a 21st century physical and digital infrastructure that supports the City Region to grow and compete globally; and to do this in a way that enhances places, transforms connectivity, maximises GVA benefits, minimises carbon impacts, and enables all businesses, people and places to have access to opportunities

Stating that the rationale for this priority is:-

"High quality infrastructure is the bedrock upon which economic success is built. We have begun to make progress through recent investments in broadband networks and by securing the £1 billion West Yorkshire Plus Transport Fund, which will significantly enhance road, rail and bus links across the city region over the next decade."

"High quality digital infrastructure supports all priorities of this strategy. Schemes such as Super Connected Cities and Superfast West Yorkshire and York, as well as North Yorkshire projects, continue to deliver major digital infrastructure improvements. But we want to go further still to ensure no business – in urban or rural areas – faces digital disadvantage that holds back growth and perpetuates exclusion."

Currently, the Council do not have digital infrastructure specific policy in the Local Development Plan. However, Council and Regional Economic Strategies are very clear that mobile telecoms infrastructure is absolutely vital to the social and economic wellbeing of Kirklees, and is fundamental to its sustainability and progress.

This is particularly relevant to the proposal given it is a replacement of a previous site that has since been decommissioned and without that replacement there will be a large area of homes and businesses with no useful mobile broadband coverage. In the context of this and the strategic policy outlined above great weight should be placed on the material socio-economic benefits associated with the proposal.

The LDP is outdated and is in the process of being replaced. There is limited prescriptive policy requirements for digital connectivity infrastructure in those documents or the emerging Local Plan. This places greater weight on the NPPF policy and national 'Code of Practice' Planning Guidance.

National Digital Strategy, Planning Policy and Guidance:-

Code of Practice for Wireless Network Development in England
In March 2022 UK Government published their 'Code of Practice for Wireless Network Development in England' Planning Guidance document.

The document notes that...

"The aim of the Code of Practice is to ***support the government's objective of delivering high quality wireless infrastructure*** *whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties"*

This guidance document is clear that...

"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 document clearly establishes the material socio-economic benefits of digital connectivity. However, from a really practical perspective, is also really useful in outlining the technical constraints associated with mobile infrastructure that dictate siting and design.

This application has gone into detail on the siting and design rationale of this proposal and this wholly aligns with the principles established within the Government guidance document. These technical constraints, and the solutions necessary to overcome them, are material considerations that should be given weight in favour of the proposal in any determination.

Paras 28 and 40 discuss how proposals should minimise impact through good design and utilise colours that minimise and reduce contrast – this is wholly the case here with the colouring of the mast – grey pole as it will be viewed adjacent to existing grey vertical infrastructure and grey antennas as they must clear surrounding built and natural environment obstacles for radio propagation and will be seen against a typically grey sky (though we can colour the pole any colour that the authority deems appropriate).

All of these matters wholly align with the proposal. As such, the proposal wholly aligns with the Planning guidance for England provided by UK Government.

NPPF

First published in 2012 but updated as recently as December 2024 with a Government consultation just concluded, the NPPF is the central planning policy document for England. It sets out the government's expectations for how planning decisions should be made and how development should be delivered.

The golden thread of the NPPF is a presumption in favour of sustainable development.

Chapter 10 'Supporting High Quality Communications' sets out the main policy tests for telecoms proposals. It states...

"Advanced, high quality and reliable communications infrastructure is ***essential for economic growth and social well-being****. Planning policies and* ***decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G)*** *and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."*

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

The policy also notes that when applying for a new mast evidence should be provided to show how the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.

Again, the proposal wholly aligns with the policy tests required in the NPPF. It is significant to note the policy test specifically and purposefully notes 'consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion' – this is an acknowledgement of the technical constraints associated that directly influence siting and design (also noted in the Code of Practice Guidance) and gives clear indication and direction that weight must be applied to those operational matters.

The policy concluded that sites should be designed sympathetically – it is been demonstrated throughout the document that through considered siting and design impact has been minimised – siting as far away from residential property as possible, utilising trees as backdrop and screening, colouring to assimilate with other adjacent structures, the lowest height that will keep the site viable operationally/technically and the most slimline a pole design possible as it is the most sympathetic to the locality even when a more robust pole or lattice would be better operationally.

Evidence has also been provided of a robust sequential test that explores many numerous siting options, including on buildings and other structures, and clearly concludes that this is the most appropriate and least impactful siting.

With all this is it clear that the proposal wholly aligns with NPPF policy tests and requirements.

Furthermore, beyond Chapter 10, NPPF Chapter 6 'Building a Strong, Competitive Economy' specifically advocates support for Digital Connectivity proposals....

"Planning policies should...

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

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

a) *clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and* ***infrastructure that are needed to support the growth of these industries*** *(including data centres and grid connections);*

c) *the expansion or modernisation of other* ***industries of local, regional or national importance to support economic growth*** *and resilience."*

This policy goes further in adding great weight to the material benefits of the proposal as a counterbalance to perceived harm.

Mobile connectivity will be vital for the modern economy, connecting people and AI with data centres. Connecting IoT devices in Smart Cities with numerous benefits, including carbon reduction. Mobile infrastructure is clearly the 'infrastructure that is needed to support the growth of these industries'.

Furthermore, this section of this document has gone into great detail in demonstrating how the proposal aligns with local, regional and national digital and economic aspirations – as such it also aligns with the NPPF policy supporting 'industries of local, regional or national importance to support economic growth'.

In short, the proposal wholly aligns with both Chapter 10 and Chapter 6 of the NPPF and that must be given great weight in this determination and Planning Balance assessment.

Other National Strategy and Policy

It is felt that it is unnecessary to quote all the relevant documents but it is appropriate to reference them as they clearly show the intent, rationale and of the Government in relation to development like the proposal...

- Wireless Infrastructure Strategy
- Planning and Infrastructure Bill
- 10 Year Infrastructure Strategy

It is also significant to note that, under commitments made within the 10 Year Infrastructure Strategy a consultation on a review of Part 16 of the GPDO has just been concluded – this is with a view to reduce restrictions on digital connectivity infrastructure to promote its delivery. An NPPF consultation which has also recently concluded is also expected to add even more policy support for digital communications.

Ministerial Statements
Written Ministerial Statement UIN HCWS867: Boosting growth by removing barriers to digital infrastructure deployment, made by the then Minister of State for Data Protection and Telecoms, Sir Chris Bryant (attached to this application) states:-

"Digital infrastructure ***underpins growth right across the economy****, and is also a powerful contributor to the economy in its own right, with the sector worth an estimated £50 billion to the UK.* ***It supports the adoption of new and emerging technologies including Artificial Intelligence*** *and enables citizens to participate in modern life. In an increasingly online world, growth in data consumption and increased* ***demands on the UK's digital infrastructure mean there is an urgent need to support the sector in delivering greater connectivity for local communities and businesses.***

We are committed to the rollout of gigabit-capable broadband and 5G networks, with the ultimate goal of enabling businesses, residents, and institutions to access seamless and reliable connectivity. ***These efforts are essential to building a more competitive, equitable, and digitally connected nation****."*

This clearly articulates Government's commitment to removing planning barriers, accelerating deployment and recognising digital communications infrastructure as critical to economic growth.

Similarly, Statement UIN HCWS1325 by Parliamentary Under-Secretary of State for AI and Online Safety Kanishka Narayan makes clear that:

*"Digital connectivity is at the foundation of our economy and society and **underpins almost every part of daily life**. The strength, security, and resilience of our digital infrastructure matters deeply to people, business and the economy in the UK."*

Other Material Considerations – Appeals

It is wholly acknowledged that every proposal must be considered on its own merits and there is no such thing as precedent in Planning.

However, appeal decisions can be material considerations to decisions with similar characteristics and main matters. They are certainly material considerations that can be given significant weight in cases where procedural and principle matters are established.

A dominant procedural and principled feature in appeal decisions is that there is a need for balance and identifying the least impactful option. In many cases harm can be identified but that harm must be **balanced against the material benefits, the technical constraints and the lack of a better viable option**. When that appropriate Planning Balance occurs, especially in the context of prior approval where the principle of the development is established in law, then proposals are often deemed acceptable, on balance.

While harm associated with this proposal is minimal, significantly, it is clear that great effort and consideration has gone into identifying the technically viable siting and design with the least impact.

In that context some recent, procedural and principle establishing, appeal decisions have been referenced below. These procedural and 'in principle' matters are wholly relevant to the proposal:-

APP/P4605/W/25/3359736

*"In conclusion, the siting and appearance of the proposed development would appear overly prominent and visually intrusive within the street scape. It would **therefore result in harm to the character and appearance of the area due to its height and siting**. Additionally, it is for the same reasons that it would result in harm to the living conditions of neighbouring residents regarding outlook."*

*"The **Framework recognises that high quality and reliable communications infrastructure is essential for economic growth and social well-being**. Consequently, it supports the expansion of electronic communications networks, including 5G.*

The appeal scheme would provide coverage in an area which has no effective coverage. The lack of coverage would likely lead to a lack of/or very poor call set up, dropped calls and no capacity leading to no service.

*The **appellant has provided a sequential approach to site selection** in which approximately 32 sites were assessed. Many of the sites have been discounted due to, amongst other things, inadequate pavement widths, the presence of underground services and/or overhead lines, closer proximity to dwellings and/or education facilities, greater visibility due to both a lack of natural screening and/or requirements of a taller mast due to lower typography, proximity to access points, reduction in parking provision and /or visibility splays, as well as practical requirements to ensure no competition between the proposed 5G coverage and existing 3G and 4G cell areas and to achieve International Commission on Non-Ionizing Radiation Protection (ICNIRP) certification. **Various buildings and structures were also considered as part of the sequential approach however these were likewise discounted for practical reasons.***

*Given all of the above, in my judgement, it has **been adequately demonstrated that there are likely to be no other appropriate sites**, including buildings and existing masts, than the appeal site. I therefore **attach <u>significant weight</u> in favour of the appeal as a consequence**.*

*In conclusion, I consider the moderate **harm** the installation would cause to the character and appearance of the surrounding area and living conditions of neighbouring residents regarding outlook would be **outweighed by the benefits** of a high-quality communications network facilitated by the proposed development and **the lack of any more suitable alternative sites to provide this benefit**."*

<u>APP/P4605/W/24/3349032</u>

*"I have found that the proposed development, through its siting and appearance, **would cause harm to the character and appearance of the area** for the reasons given above. The other options that might be available are therefore an important consideration.*

*The **Framework supports the development of a high-quality reliable communications infrastructure as this is deemed to be essential for economic growth and social well-being**. Nonetheless, it requires sites to be kept to a minimum and encourages the reuse and adaptation of existing base stations. Paragraph 122 of the Framework expects evidence to be submitted to justify all applications. For a new mast or base station this includes evidence that the possibility of erecting antennas on an existing building, mast or other structure has been explored.*

*The proposal is required to provide 5G coverage. It has been demonstrated that **the site is within an area with demonstrable need for an additional installation in the vicinity to achieve a full and appropriate level of coverage**. The coverage map has informed the appellant's search area for the new equipment and a sequential approach has been taken. In support of the application and now appeal, the **appellant has undertaken an assessment of 42 alternative sites within the defined search area required to provide coverage for the target area**. This included an assessment of several alternative sites that were identified by the Council.*

The appellant has supplied a number of reasons as to why these sites should be discounted from the search *including: concerns with upgrading the existing mast nearby, interference between masts, issues with the structural suitability and wind loading requirements of buildings in the search area and the impact the surrounding buildings and topography of the area would have upon signal transmissions. Certain sites were also discounted due to concerns with highway safety and the nearby railway line and underground services. Some sites were situated within residential areas or within parks close to trees that were covered by a Tree Preservation Order as well as concerns over the effect of the mast upon the character and appearance of the area which provided reasons to discount them.*

Several of the alternative sites were located in the 'most' and 'more' sensitive locations as per the Guide. ***While the site is in a 'more sensitive location', the proposed equipment is required to be sited within the search area and the principal of such equipment is not in dispute****. Taking into* ***consideration the significant constraints identified for the alternative sites****; existing buildings, masts, and other structures have been explored and reasonably discounted. Furthermore, comprehensive, and reliable evidence has been given for discounting other possible ground-based mast sites.*

I conclude that the siting and appearance of the proposed installation ***would cause harm to the character and appearance of the area. However, based on the evidence before me, it is unlikely that there is a more suitable site within the search area that may reasonably be available. Therefore, any identified harm is outweighed by the need for the installation to be sited as proposed, taking into account the suitable alternatives****."*

APP/P4605/W/24/3357531

"As I have found that the ***proposal would cause harm to the character and appearance of the area, the National Planning Policy Framework (the Framework) requires that evidence of alternative sites is provided to justify the proposed development****. Where this is in relation to a new mast or base station, this evidence should include that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure.*

I have no reason to doubt that the cell ***search area is extremely contained****. On the basis of the evidence before me, I am* ***satisfied that the appellant has demonstrated that there is an identified need for the proposal to be located somewhere in the search area****.*

*The Council suggests that there are more suitable locations nearby. However****, the appellant has provided details of a number of alternative sites which were considered and discounted as part of the site selection process****, including detailed supporting information to fully corroborate that an exhaustive search of all possible sites was undertaken. These sites were discounted for a number of reasons including proximity to residential properties and other buildings, impact on visibility splays and proximity to underground services****. I am satisfied that there are no realistic opportunities to erect antennas on existing buildings, masts or other structures****. I consider that* ***the site selection process was robust and potential alternatives discounted on reasonable grounds and that the appellant has demonstrated that there are no clear alternatives which would be preferable. This carries significant weight in favour of the proposal.***

*The **proposal would support high-quality infrastructure, an approach which is supported by Chapter 10 of the Framework**. When **balancing this benefit against the harm identified** in **relation to the first main issue, I consider that the benefits of the proposal would outweigh the identified harm** to the character and appearance of the area."*

It is clear that this proposal complies with...

- The Kirklees Local Plan (2019) and the relevant development plan policies;
- The West Yorkshire Combined Authority's strategic digital connectivity and economic growth ambitions;
- National Planning Policy (NPPF)
- National Planning Guidance (Code of Practice for Wireless Network Development)
- Wider national economic and digital aspirations and strategies
- Meets appropriate procedural and balance tests applied in appeal decisions

Planning Assessment

In accordance with Part 16 of the Town and Country Planning (General Permitted Development) (England) Order, this development is to be assessed primarily in terms of its siting and appearance.

Whilst the provisions of the Development Plan are not determinative under the Prior Approval process, they remain material considerations where relevant to matters of siting, design, accessibility and visual impact. The principal considerations arising from this proposal are therefore whether the development would appear visually intrusive or out of character with the surrounding area and whether the proposal has been appropriately sited and designed having regard to the operational requirements of the network, local design objectives and accessibility considerations.

Siting

As detailed elsewhere within this Planning Statement, there is an identified operational requirement to improve mobile network coverage and capacity within this part of Dewsbury. The proposed location has been selected following a comprehensive assessment of potential alternatives within the defined search area, taking account of radio planning requirements, topography, residential and visual amenity, highway constraints, underground services, arboricultural considerations and overall deliverability.

It is acknowledged that the introduction of a 20m telecommunications installation will result in a degree of visual change. However, as is evidenced by the accompanying photomontages, the proposal has been carefully positioned to integrate with its surroundings whilst providing the height and elevated position necessary to achieve the required 4G and 5G coverage objectives.

The selected site occupies a grass verge along Moorlands Avenue adjacent to open allotment land. This open setting provides a greater degree of separation from surrounding residential properties than many of the alternative locations considered and avoids introducing the

installation directly outside front-facing residential windows or private amenity areas. Furthermore, the site's naturally elevated position is fundamental to achieving the required radio propagation characteristics, allowing the identified coverage objectives to be met without the need for a taller structure or additional telecommunications installations elsewhere within the search area.

The proposal will be experienced within an established highway corridor characterised by street lighting, overhead telecommunications infrastructure, utility apparatus, mature trees and other existing streetscape features. Collectively, these elements provide an appropriate context for telecommunications infrastructure and reduce the prominence of the proposed monopole within the wider street scene, as demonstrated by the accompanying photomontages.

The proximity of existing telecommunications infrastructure has also been taken into account. While the proposal would introduce a separate installation, its siting within an established infrastructure corridor would consolidate telecommunications development within an area already characterised by utility and highway apparatus. This represents a more coherent and contained approach than dispersing additional telecommunications infrastructure into less developed and more sensitive residential parts of the search area. The proposal would therefore avoid unnecessary proliferation across the wider locality, while the separation between the installations and the intervening streetscape features would ensure that they are not experienced as a single visually dominant cluster.

The site also lies outside the Northfields Conservation Area, ensuring the proposal avoids direct impacts upon designated heritage assets whilst remaining sufficiently separated from the more sensitive townscape identified elsewhere within the search area.

Particular regard has been given to the mature trees adjoining the site. The accompanying Arboricultural Impact Assessment confirms that the proposal can be implemented without the removal of any existing trees and with only negligible arboricultural effects through the application of appropriate mitigation measures. The retained tree belt will also continue to provide an effective visual backdrop to the proposed installation, further assisting its integration within the surrounding environment.

The selected Moorlands Avenue location therefore represents the least harmful and most appropriate viable solution identified within the search area. It satisfies the Operator's radio-planning requirements through its elevated position, maximises separation from sensitive residential receptors where practicable, avoids designated heritage assets, minimises arboricultural impacts and concentrates development within an established infrastructure corridor rather than dispersing further installations throughout the surrounding residential area.

Visual Appearance and Design

The proposed 20m Orion streetworks monopole represents the minimum height necessary to provide the required enhanced 4G and 5G coverage and capacity across the target area. The height is required to overcome radio propagation constraints associated with surrounding buildings, mature vegetation and other physical clutter whilst enabling the installation to operate effectively.

The Orion design has been specifically selected to minimise visual impact. Its slimline vertical profile provides a considerably less visually intrusive solution than alternative lattice towers, headframes or more substantial telecommunications structures. The simple, utilitarian appearance is also appropriate to its position within an established urban highway environment containing existing lighting columns, overhead infrastructure and other vertical streetscape features.

The selected location benefits from the openness of the adjoining allotment land and existing mature vegetation on Moorlands Avenue, which assist in reducing the sense of enclosure or visual dominance that could arise were the installation positioned within one of the more tightly developed residential streets elsewhere within the search area. The submitted photomontages demonstrate that, although the upper section of the monopole will remain visible, it will be experienced as a slender vertical element within the wider urban streetscape.

Particular regard has been given to the quality and functionality of the public realm. Rather than simply accommodating the proposed equipment within the existing verge, the scheme has been designed to incorporate an additional section of footway around the installation, maintaining pedestrian permeability and ensuring that users of Moorlands Avenue can continue to move safely and conveniently through the site. This design approach avoids unnecessary obstruction of the pedestrian route whilst responding positively to the operational requirements of the development. Consequently, the proposal not only minimises its impact on the public realm but also reflects the placemaking and high-quality design objectives of Policy LP24 of the Kirklees Local Plan, together with the well-designed places principles set out in Chapter 12 of the National Planning Policy Framework.

Overall, the proposed design represents the least visually intrusive practicable solution capable of delivering the required network improvements. Its slimline form, carefully selected position, relationship with existing vegetation and proposed additional landscaping collectively minimise its effects upon the character and appearance of the surrounding area.

Residential Amenity

The wider search area is predominantly characterised by low-rise residential development, making the relationship between the proposed infrastructure and nearby dwellings a key consideration throughout the site selection process. Accordingly, the proposal has been carefully sited to minimise its effects on residential amenity whilst meeting the Operator's operational requirements.

The selected site occupies a grass verge adjacent to open allotment land, providing a greater degree of openness and separation from neighbouring residential properties than many of the alternative locations considered. Unlike several discounted sites, which would position a 20m monopole directly outside front-facing habitable room windows or in close proximity to private gardens, the proposed location benefits from an open setting that reduces the visual relationship between the development and surrounding dwellings.

The site also benefits from the presence of mature trees along Moorlands Avenue, which provide an established visual backdrop and assist in integrating the proposed monopole into the wider streetscape. As demonstrated by the accompanying photomontages, the installation will be

perceived as a slender vertical feature within an existing highway corridor characterised by lighting columns, overhead telecommunications infrastructure and mature vegetation, rather than as a dominant feature within a predominantly residential street.

The proposal will not result in any material loss of privacy, overlooking, overshadowing, loss of daylight, vibration, odour or artificial lighting impacts. Once operational, activity at the site will be limited to occasional inspection and maintenance visits, with no regular comings and goings capable of affecting the living conditions of neighbouring occupiers.

Accordingly, whilst the visual presence of the monopole is acknowledged, the careful siting of the proposal, the openness afforded by the adjoining allotments, the retention of mature vegetation and the separation achieved from surrounding residential properties ensure that the development would not give rise to an unacceptable impact upon residential amenity. The proposal therefore strikes an appropriate balance between delivering essential digital infrastructure and safeguarding the living conditions of nearby residents, consistent with the design and amenity objectives of the Kirklees Local Plan and the National Planning Policy Framework.

Sequential Test and Lack of Alternative Options

The proposed development has been identified following a comprehensive sequential assessment of potential locations within the defined search area. The search area is tightly constrained by the Operator's radio planning requirements, which dictate the geographical area from which the required improvements to network coverage and capacity can be achieved. Consequently, only a limited number of locations are capable of satisfying the operational requirements whilst also presenting an acceptable planning solution.

The search area is characterised predominantly by established residential development together with highway infrastructure, public open space, allotments, mature trees and a significant concentration of underground statutory undertakers' apparatus. These constraints substantially limit the availability of suitable locations capable of accommodating a 20m telecommunications installation without giving rise to unacceptable engineering, operational or planning impacts.

A comprehensive Sequential Site Assessment has considered many alternative locations, including streetworks, rooftop, existing developed land and other potential opportunities. The alternatives were discounted for a variety of reasons including unacceptable relationships with nearby residential properties, insufficient radio propagation resulting from lower topographical positions, extensive underground services, constrained footway widths, proximity to highway junctions and pedestrian crossings, structural limitations, engineering and construction constraints, landownership issues and other operational requirements that prevented successful delivery of the development.

The selected Moorlands Avenue site was identified as the least harmful and most appropriate viable location. Its naturally elevated position is fundamental to achieving the required radio propagation characteristics whilst avoiding the need for a taller structure or additional telecommunications installations elsewhere within the search area. The adjoining allotments provide a greater degree of openness and separation from neighbouring residential properties than many of the alternative locations, whilst the mature tree belt and existing highway infrastructure provide an appropriate visual context for the development.

The design has also been refined to respond positively to its surroundings. The accompanying Arboricultural Impact Assessment demonstrates that the proposal can be implemented without the removal of existing trees and with only negligible arboricultural impacts through appropriate mitigation measures. Furthermore, the layout has been designed to maintain pedestrian accessibility by incorporating an additional section of footway around the installation, ensuring the continued safe and convenient movement of pedestrians whilst responding positively to the placemaking objectives of Policy LP24 of the Kirklees Local Plan.

The proximity of existing telecommunications infrastructure has also informed the site selection process. Rather than dispersing telecommunications infrastructure into quieter and more sensitive residential streets, the proposal reinforces an established infrastructure corridor where vertical utility features already form part of the streetscape. This represents a more contained pattern of development and avoids unnecessary proliferation across the wider search area.

The sequential assessment therefore demonstrates that no preferable alternative has been identified which would satisfactorily deliver the required network objectives whilst resulting in a lower overall level of impact. The selected site provides the most appropriate balance between the operational requirements of the network and the need to minimise effects upon residential amenity, visual amenity, heritage significance and the public realm.

The proposal constitutes permitted development under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), subject to the applicable conditions and prior approval requirements. Accordingly, the assessment is principally concerned with the siting and appearance of the development rather than re-establishing the principle of telecommunications development.

Having regard to the extensive alternatives assessment undertaken, the constraints affecting other locations and the mitigation incorporated into the proposed design, the selected Moorlands Avenue site represents the most appropriate and least harmful viable solution within the search area. The proposal successfully balances the identified requirement for enhanced 4G and 5G connectivity with the protection of residential, visual and heritage amenity and is therefore considered acceptable in planning terms.

Conclusion and Planning Balance

To conclude, there is an identified operational requirement to enhance mobile telecommunications coverage and capacity within the Moorlands Avenue area of Dewsbury. The proposed development will facilitate improved 4G and 5G services, increasing network capacity, resilience and connectivity for residents, businesses, commuters and visitors whilst supporting the continued rollout of modern digital communications infrastructure.

The selected site has been identified following a comprehensive Sequential Site Assessment of 30 alternative locations. The assessment demonstrates that no preferable viable alternative has been identified capable of satisfying the Operator's radio planning requirements whilst resulting in a lower overall level of planning impact. Alternative locations were discounted due to a combination of engineering, operational and planning constraints, including unacceptable

relationships with residential properties, extensive underground services, constrained footways, lower topographical positions, structural limitations and other site-specific constraints.

The proposed 20m Orion monopole represents the minimum operational height necessary to achieve the required network objectives. Its slimline design, carefully considered siting and relationship with the adjoining allotments, mature vegetation and existing highway infrastructure ensure that the development integrates appropriately within the surrounding streetscape, as demonstrated by the accompanying photomontages. Furthermore, the proposal has been designed to retain pedestrian accessibility through the incorporation of an additional section of footway around the installation, reflecting the placemaking and high-quality design objectives of Policy LP24 of the Kirklees Local Plan.

The proposal also responds positively to the matters raised during the pre-application process. It has been informed by a comprehensive assessment of alternative sites, carefully integrated within an established infrastructure corridor, designed to minimise visual impact and accompanied by an Arboricultural Impact Assessment demonstrating that the development can be implemented without the removal of existing trees.

The principle of telecommunications development is established through Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). The assessment therefore relates principally to the siting and appearance of the proposed development. Having regard to the identified operational need, the absence of a preferable viable alternative, the careful design of the proposal and the significant public benefits associated with improved digital connectivity, it is considered that the proposal represents the most appropriate and least harmful viable solution within the search area.

Accordingly, the proposal accords with the Kirklees Local Plan, the National Planning Policy Framework, the National Planning Practice Guidance and the Code of Practice for Wireless Network Development. The siting and appearance of the development are considered acceptable, and prior approval is respectfully sought.

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