

<p align="center">SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING</p>

1. Site Details

Site Name:	Bradford Road SW	Site Address:	Pavement adj to Ashbrow Road Bradford Road Cowcliffe Huddersfield HD2 1DU
NGR:	E: 414638 N: 419055		
Site Ref Number:	10102119	Site Type:	Streetworks Macro NTQ

2. Checklist

Site Selection

Was the Kirklees Borough Council mast register used to check for suitable sites by the operator or the LPA?		No
If no, explain why:		
It was felt that the industry database was a more up-to-date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/A		

Pre-application consultation with LPA – Kirklees Borough Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	18 th August 2026	
Name of contact	The Director of Planning – via Email.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	AMBER
<p>Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.</p> <p>The site has been given an AMBER rating under the Traffic Light Model 'TLR'. (The model assesses each proposal to be rated against standard criteria by the operator according to its likely sensitivity in terms of environmental, planning and community considerations.)</p>	

Summary of outcome:

The National Planning Policy Framework (NPPF) revised in August 2026 and the Code of Best Practice on Mobile Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an 'amber' rating when assessed against the traffic light rating model (see Appendix B of the Code of Best Practice).

EE and 3UK are committed to maintaining network coverage and capacity, most notably in relation to 5G services. It is recognised that high-speed mobile connectivity is the lifeblood of a community, facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to emergency services, social media and gaming for leisure time activities.

In our engagement letter, we outlined the appropriate traffic light rating and associated engagement requirements for the local community. We would be pleased to address any necessary matters within the determination period of the application.

Our direct engagement with the local community entailed issuing a copy of a covering letter, pre-application enquiry – site information sheet and planning drawings, detailing the proposed development. These documents were emailed to the Kirklees Borough Council and the Councillors on the 08th August 2026. Councillor Simon Duffy, Councillor David Knight and Councillor Martin Price of Ashbrow Ward area were sent these pre-application documents.

To the best of our knowledge, no response has been received from these consultees regarding our pre-application request. We believe the amber rating to be correct in this instance.

School/College

Location of site in relation to school/college:

There are one educational establishment within a 500m radius that has been identified within the vicinity of our proposed development who were sent these pre-application documents.

- Ashbrow School is approximately 410m away from the proposed site.

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	

Developers Notice

Copy of Notice one enclosed?	Yes	
Date served:	28 th August 2026	

Site and Surrounding Area

The purpose of the development is to replace the existing site located on Ashbrow Mills, where a Notice to Quit (NTQ) has been served, meaning this site has to be removed due to planned redevelopment and to add essential 5G stand-alone (SA) coverage to the north of Huddersfield centre. The proposed location is situated on the pavement of Bradford Road, adjacent to Ashbrow Road, and is approximately 160 metres from the existing telecommunications site, as shown in Figure 1 below.

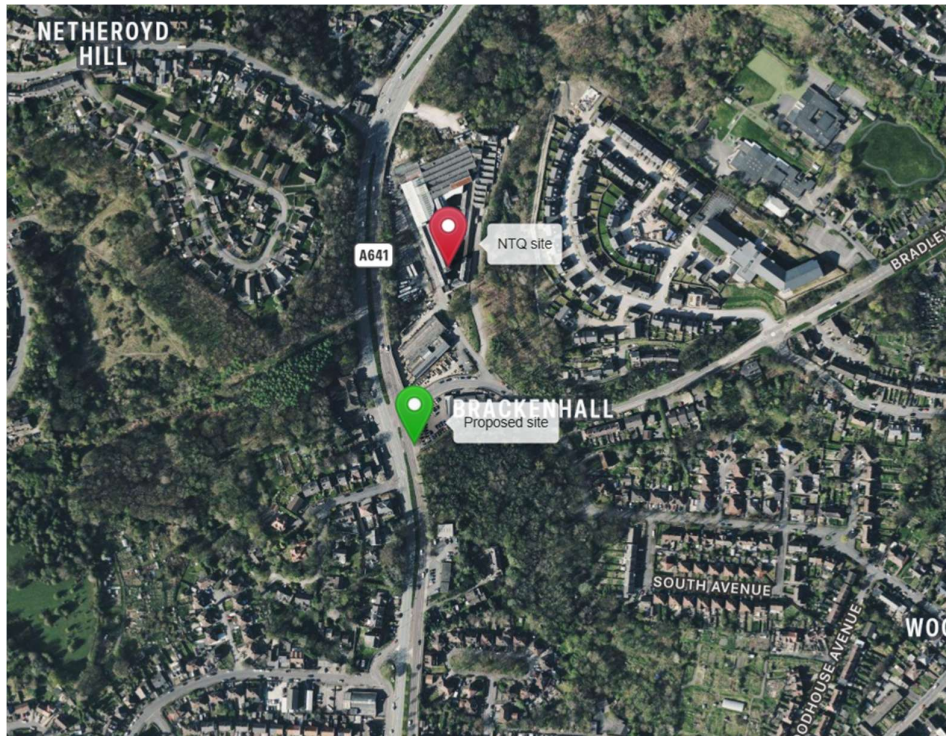


Figure 1 – The existing site (to be removed) and the proposed replacement.

The site is located on the A641 main road into Huddersfield, 1.75km south of the M62 and 2km to the north of the centre. The area is predominantly low-density residential with a mix of commercial and industrial land uses that are located off the A641, which overall is an area of high demand for reliable connectivity and improved service. The proposal provides the least visually intrusive location available while replacing the coverage that will be lost from the NTQ site and providing a new 5G service. Without this planned proposal, network coverage will be removed, with consequential effects on the ability to access emergency services and the local community's ability to use the services provided by mobile phone/internet access-based services.

The proposed site is positioned on a wide section of footpath on the eastern side of Bradford Road, next to Ashbrow Road and opposite the entrance to Allison Drive. The proposed site will be located on the roadside of the pavement nearest the highway, between the bus shelter and the roadside railing.

Bradford Road at this location is characterised by the presence of lamp posts and various items of street furniture, such as the bus shelter. There is a large bank of trees that line the road for approximately 80m and collectively, these vertical features create a visual context in which the proposed installation will not appear incongruous.

The land immediately north and east of the site is predominantly commercial, while to the west and further afield, lies a mix of residential properties and open land. The proposed location is not within a conservation area and there are no listed buildings within close proximity.

It is important to note that the proposal is the sequentially preferable solution that is as close to the NTQ site as possible, minimising the number of additional new sites and helping to avoid telecommunications proliferation in the Huddersfield area. This is due to the streetworks site fitting in within the existing network configuration, thereby eliminating the need to introduce additional base stations within the cell search area.

Proposed Development

The development for the replacement antennas and equipment cabinets is shown in detail in the drawings submitted and is required in order to provide replacement electronic communications services for the area.

The main elements to the proposed radio base station are;

- the streetworks monopole, with a wraparound cabinet installed with a root foundation.
- the antennas, which emit the radio signals (along with any necessary amplifier or receiver units) attached to the monopole headframe.
- transmission dishes that provide the links to connect this site to others and the wider network.
- cabinets which contain the equipment used to generate and receive the radio signals.
- ancillary equipment, which includes the steel grillage, feeder cables that connect the equipment within cable trays and the electricity connection.

The development for the proposed pole and equipment cabinets is located on the pavement adjacent to Ashbrow Road and the proposed development is shown in detail in the drawings submitted and is required in order to facilitate electronic communications services for the area. The replacement of the existing site at Ashbrow Mills will provide different mobile connectivity services in parallel, with high data uses operating through the new higher capacity network apparatus that is part of the development relating to this application.

The principal elements of the proposed development at the application site reflect the various siting and design factors outlined above and are outlined as follows:

The erection of a 20-metre Valmont Phase 7.2 streetworks monopole that incorporates a wraparound cabinet, 3no additional equipment cabinets, 9no stacked antennas, 1no 300mm transmission dish, 2no. GPS nodes and ancillary equipment.

Figure 2: An image to show the location of the proposed telecommunication site, image taken from Google Images.



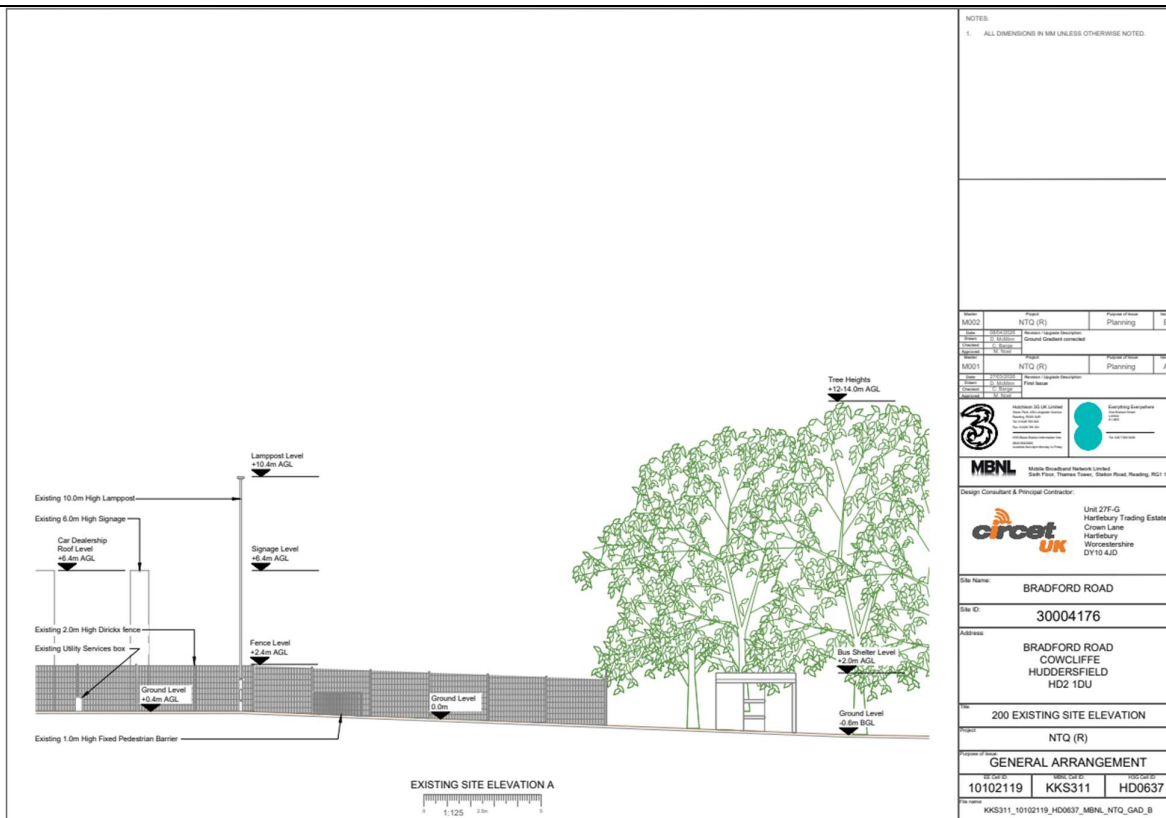


Figure 3: Planning drawings showing the existing elevation.

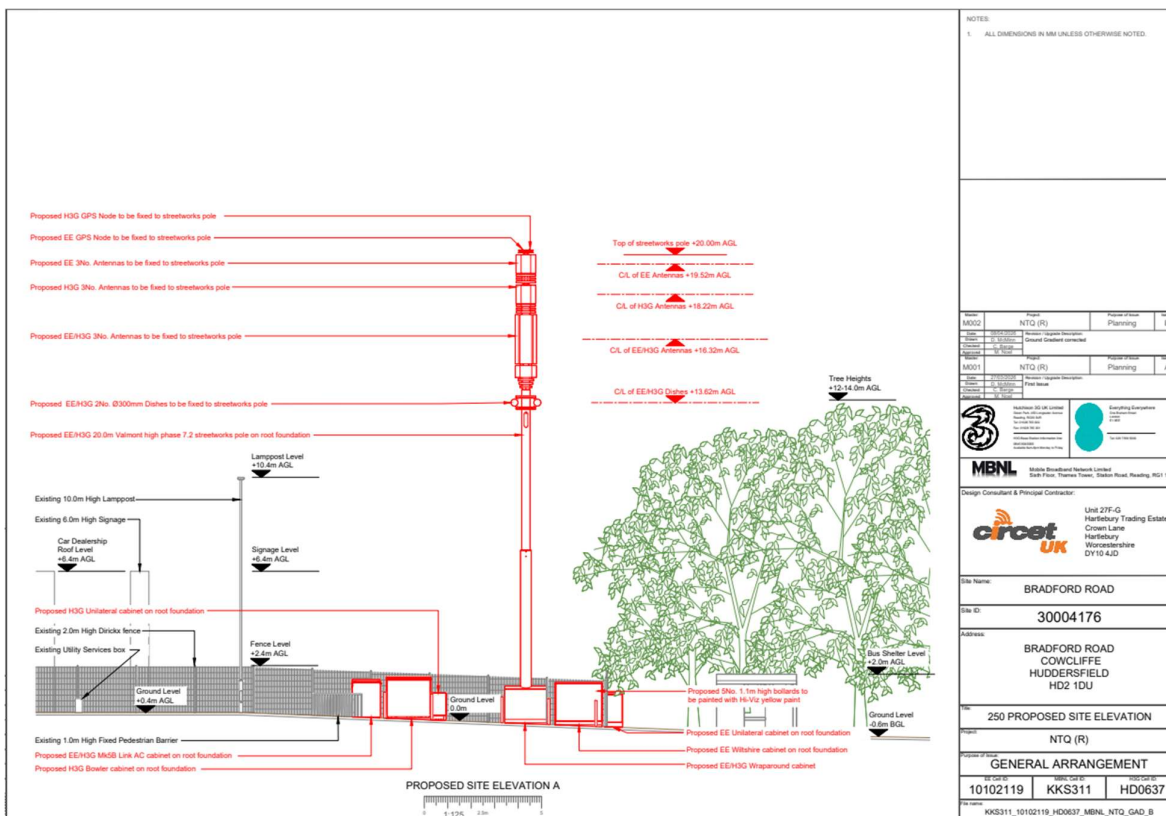


Figure 4: Planning drawings showing proposed elevation.

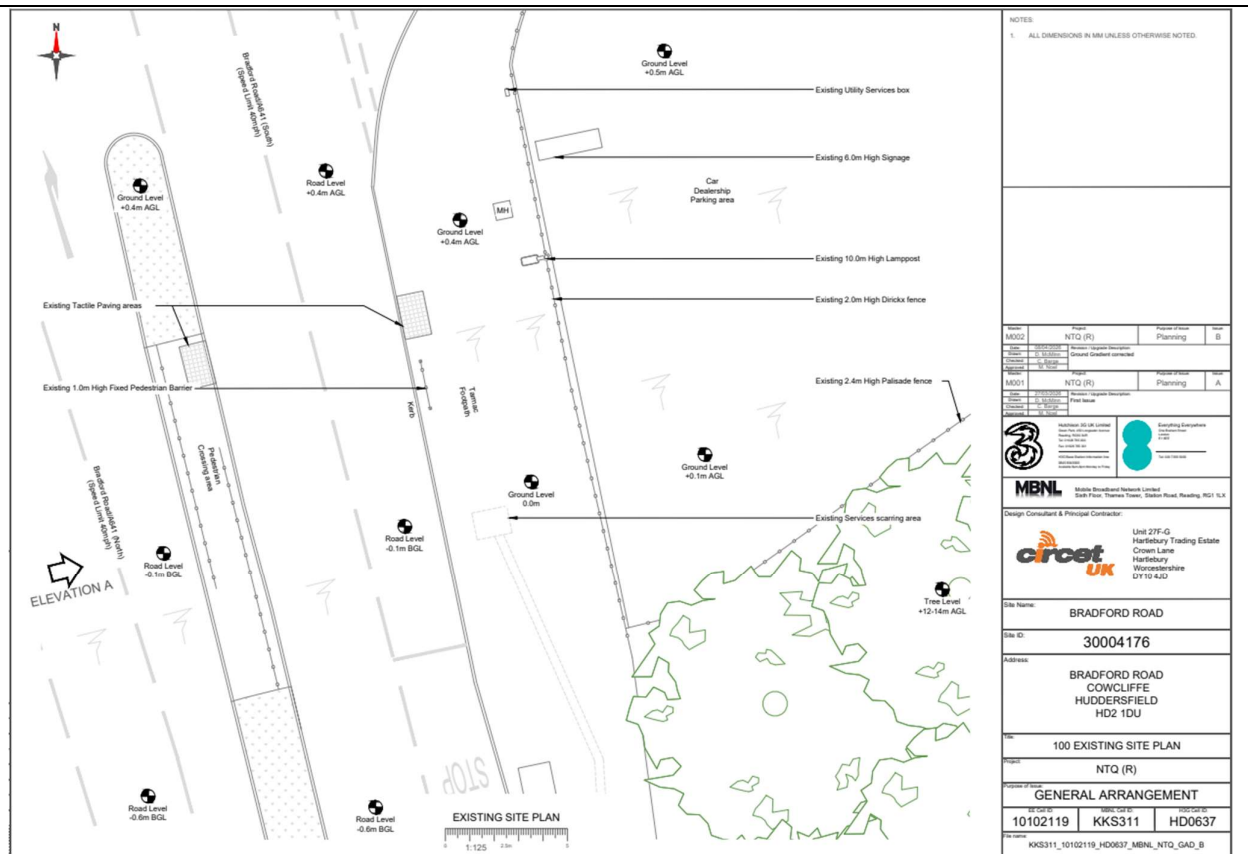


Figure 5: Planning drawings showing the existing site plan

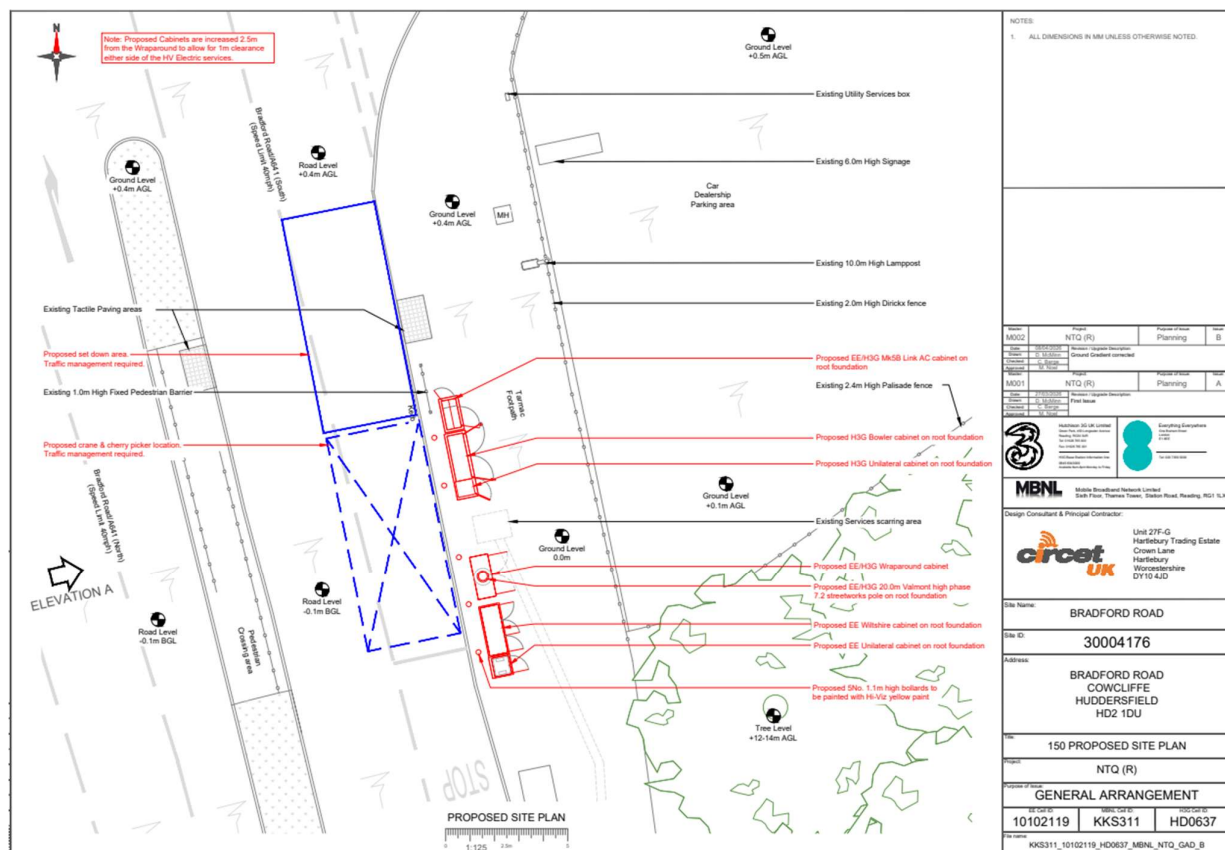


Figure 6: Planning drawings showing the proposed site plan.

The Need for the Proposal

As outlined by our pre-application consultation and the introduction (above), the proposed scheme is required to replace the network coverage within the area around Ashbrow resulting from the Notice to Quit being served on MBNL, relating to the site they manage for EE Limited and H3G UK Limited on the roof of Ashbrow Mills to the north. The proposal will also take the opportunity to upgrade equipment to improve the services provided. The proposed installation will ensure the coverage is maintained whilst providing more efficient coverage with improved capacity and data transfer speed for the area.

The NTQ site provides coverage to the area surrounding the A641 Bradford Road, including the Cowcliffe, Brackenhall, and Fartown areas, as well as the commercial and industrial areas that line the road, such as the Asda Superstore complex. It is also important to note that the site also provides coverage and essential capacity that supports the areas to the south, including the northern part of Huddersfield town centre. As such, it is imperative that replacement coverage is provided.

A telecommunications site provides coverage over a specific cell (coverage area) and functions in a similar way to television and radio reception, except the communication is two-way between the site and consumers' devices. The radio antennas provide a signal to and from mobile handsets and other wireless devices within a specific cell. The size of a cell depends upon different factors, including the height of the radio antennas above intervening 'clutter' such as buildings in the area or the trees adjacent to the site. In general, the higher the antennas are above ground, the further the signal will propagate, travelling over objects that would otherwise block or hinder it. It is for this reason that the proposed antennas are optimally at the highest point in the area.

Capacity, particularly in dense urban areas, matters because it is the only way a mobile network can keep functioning when hundreds of people are trying to use it at the same time. Without sufficient capacity, even strong signal strength becomes meaningless: calls fail, data slows to a crawl and essential digital services become unreliable.

In dense urban areas, the primary constraint on mobile network performance is capacity rather than coverage. High concentrations of users and data-intensive applications rapidly exhaust the available spectrum within each cell. The loss of a cell site not only creates a hole in coverage but increases the load on the capacity of the surrounding cells, reducing their ability to provide the quality service expected by the public and required under the Operator's OFCOM Licences. This is why finding a replacement site for the one being lost is so important to the network.

Siting and Appearance

The proposed site is situated on the pavement of the main arterial route into Huddersfield, where streetworks telecommunications installations are increasingly being used throughout the country. While the installation may be visible, this level of visibility is consistent with the existing situation, based on the existing streetlighting poles and the large bank of trees that line the road. These provide context that prevents the pole from appearing isolated or incongruent to the amenity of the area.

We acknowledge that there are residential properties in the vicinity; however, the National Planning Policy Framework strongly encourages site sharing, which helps to minimise the need for new infrastructure elsewhere. The predominantly residential nature of the area means that there are no sequentially preferable alternative locations within the defined search area.

The design of the proposed equipment represents the least visually intrusive solution available, taking into account the technical requirements needed to replace and enhance network coverage. While the proposal will involve the introduction of a 20m pole and new cabinets on the highway, this intensification is not expected to harm the character of the area as a main arterial route. The visual change will be significantly outweighed by the substantial public benefits associated with the improved connectivity, including the provision of 5G services in this locality.

Given the need to replace and enhance mobile network coverage in the area and having fully considered the environmental and planning constraints, we believe this proposal represents the most appropriate and balanced solution available. It is important to note that the scale of the proposed equipment has been kept to the minimum necessary to deliver the required improvements to network coverage and represents the solution with the least impact on the character and appearance of the area when compared with potential alternatives. Any minimal additional visual effect associated with the development will be outweighed by the significant public benefits of maintaining and enhancing mobile network coverage for the local community.

Design

The scale, layout, and design of the proposed development have been driven by the technical and operational requirements necessary to deliver replacement and 5G coverage to the local area, while also carefully seeking to minimise visual impact. In relation to the key elements of the proposal:

- The scale of the apparatus is modest, and once installed it will appear proportionate to the wider area.
- The proposed equipment closely reflects the form and appearance of the existing electronic communications apparatus used in similar transport routes throughout the country. This ensures it remains relatively unobtrusive within the surrounding streetscape.
- A monopole is proposed based on it being the most widely accepted design that can accommodate the required antennas, dishes and RRU's that are required to provide the necessary coverage in a predominantly residential area.

Within the significant technical constraints, the apparatus has been designed and positioned to respect the residential nature of the wider area. While mobile phone base stations represent a more modern form of telecommunications infrastructure, they continue to rely on many of the same operational attributes as traditional communications facilities and other street furniture in the area.

Consequently, the proposed equipment will be seen in the context of the existing apparatus and will not appear incongruous or out of place.

Type of Structure:

Description:

The erection of a 20-metre Valmont Phase 7.2 streetworks monopole that incorporates a wraparound cabinet, 3no additional equipment cabinets, 9no stacked antennas, 1no 300mm transmission dish, 2no. GPS nodes and ancillary equipment.

Overall Height:	20.0m
Height of existing building	NA
Equipment Housing:	
Length:	Please refer to the design drawings.
Width:	
Height:	
Materials	
Tower/mast etc. - type of material and external colour:	Steel – RAL 7035 Grey (unless otherwise specified by the LPA)
Equipment housing - type of material and external colour:	Steel – RAL 7035 Grey (unless otherwise specified by the LPA)

Reasons for choice of design:
<p>The proposed design has been selected to balance the technical and operational requirements of the telecommunications network with the need to minimise visual and environmental impact. Key considerations include:</p> <ol style="list-style-type: none"> 1. Technical Necessity: The design ensures that the proposed equipment can replace and support enhanced mobile network coverage, including 5G, while meeting all operational requirements for signal strength, reliability, and capacity to ensure the operational requirements of EE and Three UK are achieved 2. Minimised Visual Impact: The slender nature of monopoles means they do not appear as visually dominant as bulkier structures. In a residential urban environment context, where preserving openness is a core planning principle, this reduced bulk makes them a more sympathetic option, especially when viewed in the context of mature street trees. 3. Functional Efficiency with Reduced Footprint: Monopole structures are highly efficient for supporting telecommunications or utility equipment at height, yet they can be designed with a relatively small ground footprint. This minimises disturbance to the surrounding land, important in ecologically sensitive or protected open space. 4. Proven Compatibility with Residential and Urban settings: Monopoles are commonly used in residential and urban areas and are an established design that planning authorities are familiar with. Their proven track record in similar settings supports their appropriateness for a residential and urban location. 5. Policy Compliance: The design follows guidance in the National Planning Policy Framework and Policy LP4 Providing Infrastructure of the Kirklees Local Plan (2019). <p>There is no alternative design solution which could be employed at this site that would result in lesser visual impact. While other designs within the Applicant's portfolio, such as lattice towers or poles with wider headframes, may offer technical advantages, they are notably more visually intrusive and would have a significantly greater effect on the street scene compared to the modest street furniture pole proposed. While there is limited scope to alter the appearance of the proposed equipment, the unobtrusive street furniture design proposed would ensure the installation integrates with its surrounds with limited impact.</p> <p>The height of the proposed monopole has been determined by a specialist network radio engineer, taking into account the required coverage levels and potential obstacles in the surrounding area, such as trees and buildings (referred to as 'clutter'). These obstructions can weaken or block signals, particularly for 5G technology, which is more susceptible to such interference.</p>

For optimal performance, the antennas must be positioned above surrounding clutter to achieve a clear line of sight for the radio signal. At the application location, the presence of the 12 – 14m trees that represent clutter that degrades the effectiveness of the antennas and as the design drawings illustrate, the lowest antenna is at 13.62 to the centre line. In addition, the topography of the area, with a south-to-north incline, means that a 20m pole is required in order to replicate the coverage provided by the NTQ location.

The height of the pole and antennas is therefore critical to ensuring unobstructed radio transmission, especially for 5G antennas, making their placement vital to the effective delivery of this technology. Positioning the antennas at the proposed height enables the mast to operate efficiently, providing maximum coverage to the target area and reducing the need for additional masts within the wider locality. This supports efficient network delivery while limiting infrastructure proliferation.

Another important factor influencing the proposed monopole height is the need to comply with international public exposure safety guidelines. All UK mobile phone base stations must meet the safety standards set by the International Commission on Non-Ionising Radiation Protection (ICNIRP), an independent body whose guidelines are endorsed by both the UK Government and the World Health Organisation.

Compared with earlier generations of mobile technology, 5G is more complex and presents stricter compliance requirements under ICNIRP guidelines. This, combined with the stacked antenna configuration, means that the minimum deployable height for 5G infrastructure is greater than that required for previous technologies.

The height of the proposed monopole has been carefully determined in response to both the site context and the technical requirements outlined above. It is set at the minimum necessary to deliver the required improvement in network services for the area, whilst fully complying with ICNIRP safety standards. The height will enhance local mobile connectivity with minimum impact on the surrounding area.

Overall, the proposed monopole height represents a necessary balance between improving network coverage, minimising visual intrusion and ensuring full compliance with ICNIRP safety standards.

Technical Information

ICNIRP Declaration enclosed with the application.

ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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, under normal circumstances, 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.

Technical Justification

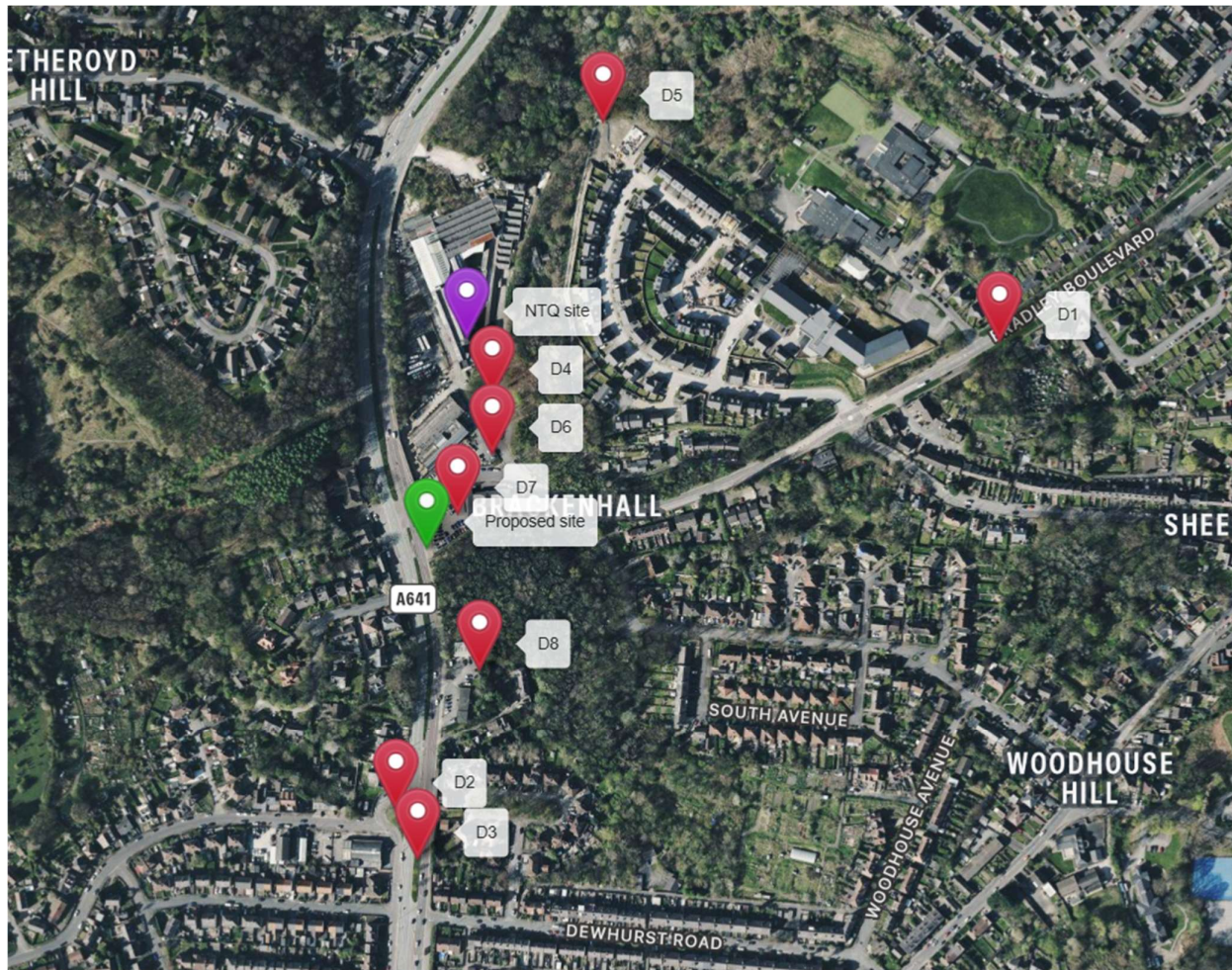
Reason(s) why site required
<p>The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 5G coverage for EE and 3UK, as well as replacing the existing 4G connectivity to significantly improve the mobile network service in and around the surrounding area. The rollout of 5G is a critical step forward in meeting the growing demand for faster, more reliable, and higher-capacity wireless communication. Compared to previous generations, 5G offers substantial improvements in download and upload speeds, reduced latency, and greater capacity to handle high volumes of connected devices — all of which are essential in today's increasingly digital and mobile world.</p> <p>Installing 5G infrastructure at this site not only ensures better service today but also plays a key role in future-proofing the network. As data usage continues to grow exponentially due to streaming, remote work, smart home devices, and emerging technologies like augmented reality and autonomous systems, a robust 5G network will be vital to supporting these developments and ensuring seamless connectivity for both consumers and businesses.</p>

Site Selection Process – alternative sites considered and not chosen.

Discounted Options		
	NGR	Discounted Reason
Existing NTQ Site Clegg Wools Ltd, Ashbrow Mills, Ashbrow Road, Huddersfield, HD2 1DU	E 414671 N 419215	EE and H3G 'Three' have an existing telecommunications site at the premises of Clegg Wools Ltd, including a series of radio antennas and associated equipment upon the existing rooftop. The property owner is seeking to redevelop part of their premises which will conflict with part of the telecommunications apparatus. As a result, the existing site is to be decommissioned. A replacement will be needed to maintain essential network coverage and capacity around the local area.
D1 – Bradley Boulevard, Fartown Green, Sheepridge, Huddersfield, HD2 1DZ	E 415084 N 419217	This site has been discounted due to a three-storey building around 70 metres to the west, which is located on higher ground and therefore would likely block coverage. Furthermore, this site is located directly in front of residential houses, making it unsuitable for a new installation.
D2 – York Avenue, Netheroyd Hill, Fartown, Huddersfield, HD2 2QR	E 414614 N 418851	The site has been discounted as its lower elevation compared to the existing NTQ location would result in reduced coverage performance. Furthermore, the verge is extensively covered by trees, which would further restrict coverage and make the location unsuitable for a new installation.

D3 – A641, Netheroyd Hill, Fartown, Huddersfield, HD2 2RB	E 414632 N 418813	The site has been discounted due to the limited width of the central reservation, which does not provide sufficient space for the proposed installation. The available space would not allow the equipment and supporting infrastructure to be accommodated safely while maintaining suitable clearance from the carriageway and surrounding road infrastructure. As a result, the location is not considered suitable for the proposed installation.
D4 – Ashbrow Road, Fartown Green, Fartown, Huddersfield, HD2 2RB	E 414689 N 419174	This site has been discounted due to the steeply sloping verge and extensive tree cover, which would make construction and installation difficult. The surrounding trees would also limit the potential for a clear and effective coverage solution.
D5 – Ash Meadow Close, Fartown Green, Sheepridge, Huddersfield, HD2 1EX	E 414774 N 419387	This site has been discounted as it is located within an active residential redevelopment area. Ongoing and proposed development works would make the location unsuitable for a new telecommunications installation.
D6 – Ashbrow Road, Fartown Green, Fartown, Huddersfield, HD2 2RB	E 414688 N 419129	This location has been discounted due to its position within a commercial yard, which is used for day-to-day business operations. The limited available space and ongoing use of the yard would make the installation and future maintenance of telecommunications equipment unsuitable
D7 – Ashbrow Garage, Ashbrow Road, Fartown Green, Fartown, Huddersfield, HD2 1DU	E 414661 N 419082	This site has been discounted as it forms part of a car dealerships and is used mainly for storing and moving vehicles. The limited space available and the need to maintain access across the site make it unsuitable for a new telecommunications installation.
D8 – National Windscreens Huddersfield, 394 Bradford Road, Huddersfield HD2 2QZ	E 414679 N 418959	The land height drops considerably to the south and the site would not provide sufficient replacement coverage in order to justify the development and second location would potentially be required. Also, the site was judged to have insufficient access to a location that would provide the necessary coverage and insufficient available space to safely accommodate the proposed equipment.

Figure 7 – Map of discounted sites



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

NA

Development plan considerations have a special significance in law. Section 70(2) of the Town and Country Planning Act 1990 (The Act), and reiterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

In dealing with such an application the authority shall have regard to —

- a. the provisions of the development plan, so far as material to the application, ...*
- c. and other material considerations*

At the local level, the proposal has been assessed in accordance with the Kirklees Local Plan (2019), which has an infrastructure policy. Therefore, Policy LP4 Providing Infrastructure and policies CO1 and CO2 the National Planning Policy Framework are the most relevant policies to the application.

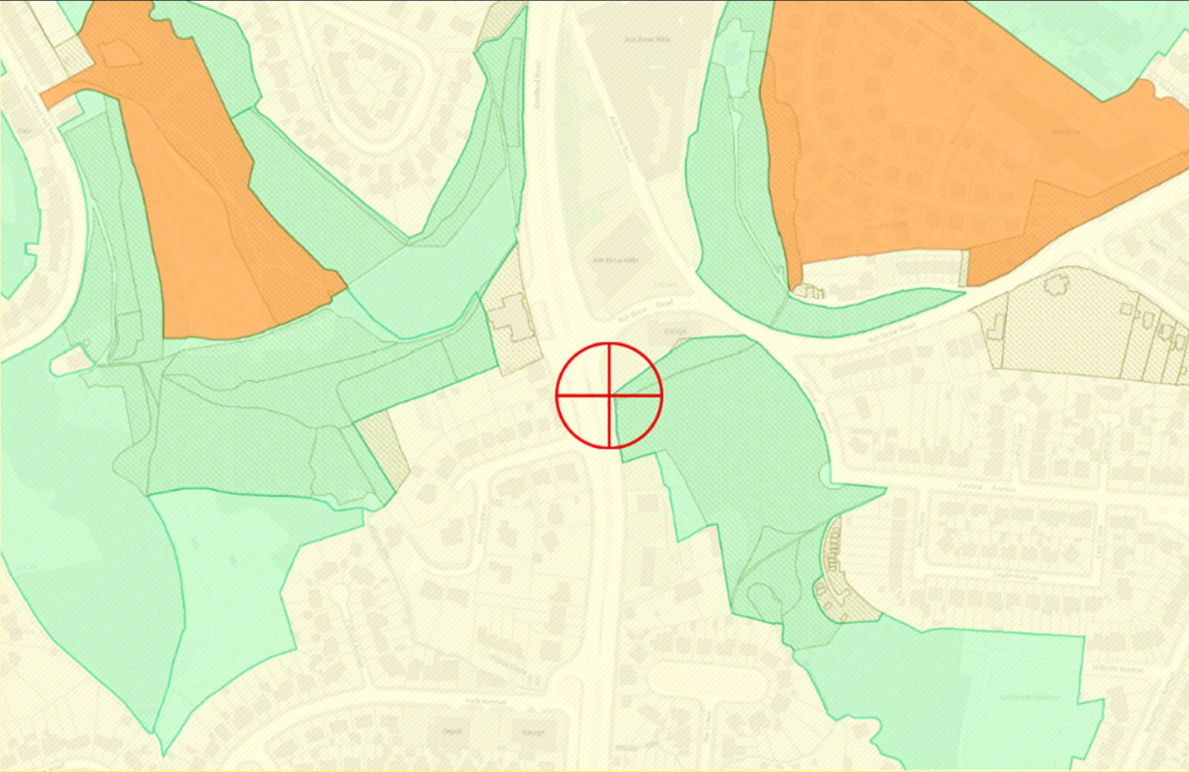


Figure 8 – Extracts captured from the Kirklees Local Plan (2019). The proposed site is indicated.

Yellow = Mineral Safeguarding Area

Green = Urban Greenspace

Orange = Housing allocation area

PLANNING POLICY

Policy LP4 Providing infrastructure

Essential infrastructure is defined as infrastructure that is required to make development acceptable in planning terms. Desirable infrastructure is described as infrastructure which would improve the capacity and deliver placemaking benefits.

Policy Assessment

The Kirklees Local Plan (2019) recognises telecommunications networks as essential infrastructure required to support sustainable development, economic growth, and digital inclusion across the Borough. The Plan's spatial strategy and infrastructure policies establish a clear expectation that modern, resilient digital communications networks will be delivered and enhanced to meet the needs of businesses, communities, and new development.

Policy LP4 identifies telecommunications as part of the critical infrastructure necessary to enable growth. The policy requires development to be supported by appropriate infrastructure provision and confirms that the Council will work proactively with infrastructure providers to ensure timely delivery. For telecommunications proposals, this establishes an in-principle policy support for new installations that improve network capacity, coverage, and service reliability.

The Local Plan's economic and digital-connectivity objectives emphasise the importance of high-quality communications networks in driving productivity, supporting innovation, and enabling access to services. The Council's strategic evidence base highlights the need for investment in advanced digital infrastructure—including mobile networks and 5G—to maintain competitiveness and ensure that all communities benefit from improved connectivity.

Taken together, the Local Plan provides a positive policy environment for telecommunications development, consistent with national policy in the NPPF (policies CO1 and CO2), which requires local planning authorities to support high-quality communications infrastructure, ensure adequate network capacity, and facilitate the expansion of digital systems.

Policy LP21 Highways and access

New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.

All proposals shall take into account the features of surrounding roads and footpaths and provide adequate layout and visibility to allow the development to be accessed safely.

Policy assessment

The proposal is located adjacent to the roadside and the cabinets are located 0.8m from the kerb, with safety bollards installed 0.45m from the kerb for health and safety reasons due to the carriageway being a 40mph zone, with the cabinet doors opening inwards towards the back of the pavement.

It is noted that there is an informal pedestrian crossing point adjacent to the proposed location and a safety barrier, which the cabinets do not interfere with. The proposal will add street furniture to a location that requires heightened pedestrian awareness; however, the cabinets do not unduly affect the sight lines of the crossing point, as the road is a dual carriageway with one-way traffic approaching from the right. Although there is a bus stop close to the proposed location, the significant width of the pavement of 6.4m at the informal crossing contributes to the suitability of the proposal and the impact will not be severe.

Policy LP24 Design

Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and master plans should be used to secure high-quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer, schemes will be submitted for design review. Proposals should promote good design by ensuring:

- a. the form, scale, layout and details of all development respect and enhance the character of the townscape, heritage assets and landscape;*
- b. they provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary;*

Policy assessment

The proposed replacement and upgraded telecommunications structure has been carefully designed to meet the policy requirements of Policy LP24, which seeks to ensure that development is appropriate in terms of its context, design quality, and impact on amenity. The proposed site is viewed within the context of the A641 Bradford Road, which as the main arterial route into Huddersfield, is a four lane dual carriageway with a central reservation.

The proposed 20-metre slimline monopole on a main arterial route into Huddersfield complies with Policy LP24 because it is sited within an infrastructure-led highway corridor, visually absorbed by a substantial 12–14 m tree bank that filters views and reduces perceived height, avoids harm to residential amenity, maintains safe and accessible footways, minimises street clutter through compact cabinet placement, and delivers essential digital connectivity using existing highway land without affecting heritage or sensitive townscape, resulting in a well-integrated, functional piece of infrastructure that respects local character and meets all LP24 design criteria.

The character and identity of the area will be unaffected on the basis that the proposal is an accepted feature the public realm at this location. In addition, a reliable digital network contributes to quality of life of the local community. The installation of the equipment will not affect the ease of movement due to the width of the pavement and the proposed equipment will help the area respond to economic, social, environmental and technological change.

Balancing operational and environmental considerations

The special operational and technical factors that require specific siting of a base station that provides replacement NTQ coverage should be balanced by the need to minimise environmental and visual impact.

However, paragraphs 3.2 – 3.3 of the Code of Best Practice explain that there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. The recent revision to the NPPF has emphasised the importance of the connectivity element, in the balance between the factors to take into account in the planning decision. It has also reduced these factors, confirming approval should be granted, if the local community has been consulted; the number of structures has been minimised (this is a one-for-one replacement) and ICNIRP Guidelines have been certified.

As a matter of principle, the development proposed is in accordance with the relevant policy framework and should therefore be acceptable.

The proposed option has benefits over alternatives, in that being located within the highway corridor means that it is detached from the residential areas to the east and west; it is not an incongruous structure in this environment; the size and massing of the structure does not form a dominant feature given the large bank of trees that line the road behind the site.

The proposed works are deemed to have a limited effect on the overall character of the area as the principle of street furniture development is established feature in this type of highway environment. The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operators and minimising environmental impact.

The existing installation on Ashbrow Mills is being removed following the NTQ and without this replacement site, the north of Huddersfield will experience a significant reduction in mobile digital services that will directly impact a major arterial route into the town. It is considered that the proposed works that will form this application would have a low environmental and visual impact to the wider context of the surrounding area. This proposal seeks, individually, to provide network continuation and enhanced services, as an integral part of the wider radio network.

Telecommunications development is highly sustainable. Indeed, mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data, video and voice calls to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel and travel time, thereby reducing carbon emissions and increasing the speed in which information is processed/shared.

Central Government has expressed a support for necessary new telecoms installations and the deployment of new technology within the revised NPPF. It is seen as essential for the country to develop and exploit the advantages of such new technology to the direct benefit of the public and the economy.

The proposed development has been carefully designed to accord with this principle, ensuring it integrates well within its context while minimising any potential impact on residential and wider amenity.

NATIONAL PLANNING POLICY: National Planning Policy Framework

The National Planning Policy Framework was revised in August 2026 and sets out the government's policies for England and how these are expected to be applied. These Policies form a material consideration to the application for planning consent. The most recent NPPF demonstrates continued government support for telecommunications infrastructure and recognises its importance:

CO1: Proposals for telecommunications infrastructure

- 1. In considering proposals for the expansion or upgrading of electronic telecommunications networks, substantial weight should be given to the benefits of maintaining or improving network coverage, capacity, reliability and resilience, including where significant improvements are required such as along rail corridors. This includes, but is not limited to, providing for next generation wireless technologies (such as standalone 5G), gigabit-capable broadband connections and supporting infrastructure such as fibre exchanges. Proposals for such development should:*

- a. *Use existing masts, buildings and other structures already employed for this purpose, upgrade, or replace existing infrastructure, unless there is no reasonable opportunity to do so (taking into consideration meeting consumer needs, the efficient operation of the network and providing reasonable capacity for future expansion);*
 - b. *Be sited and designed to minimise the visual impact of the proposals, especially in situations where a new site or structure is proposed, so far as practical taking into account its operational requirements;*
 - c. *Not result in cumulative exposure to non-ionising radiation exceeding International Commission guidelines³² when the development is operational; and*
 - d. *Not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.*
2. *In assessing proposals for telecommunications infrastructure, local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development, seek to prevent competition between different operators, question the need for the expansion or upgrading of telecommunications networks, or use health safeguarding standards different from the International Commission guidelines on non-ionising radiation protection.*

CO2: Supporting information for telecommunications infrastructure proposals

1. *Development proposals for electronic telecommunications infrastructure (including applications for prior approval under the General Permitted Development Order, as amended) should be supported by the following, where relevant:*
- a. *Information on the outcome of pre-submission consultation with organisations with an interest in the proposed development (in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area;*
 - b. *Where a new site is proposed, evidence that the applicant has sought to keep the number of these to a minimum in accordance with policy CO1(1)(a). This should include evidence that the possibility of erecting any antennas on an existing building, mast or other structure has been explored; and*
 - c. *Evidence demonstrating compliance with policy CO1(1)(c) and (d), including a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection.*

Additional Relevant Information

Background to the Proposal

EE supports the Government's ambition to be a global leader in the next generation of mobile technology, set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the Leeds area and specifically in this instance, to provide and maintain 4G & 5G coverage levels in and around this area of Huddersfield.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a local community, which aligns with the local development plan.

Conclusion

The application is in respect of a 5G electronic communications base station necessary to improve a vital network that provides public services. We consider that this proposal is vital to ensure there is no loss of mobile connectivity in the area.

The service provided by the operator is in the public interest and is in very high demand, with 5G being the next and highly significant advancement in mobile connectivity. The area requires urgent replacement coverage following the NTQ to meet the operator's license obligations and network capacity requirements. The base station will also accommodate new technologies, being the next and highly significant advancement in mobile connectivity. In the UK, mobile services now exceed fixed landlines in terms of customer numbers and usage.

The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.

The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even more important for 5G apparatus. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.

The operators have followed national and local planning policy and best practice guidance in the siting and design of their apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like MBNL
- Siting at a location of an electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Engagement in accordance with the Code of Best Practice procedures.
- An examination of design options to try and minimise potential visual impact.

The proposed development will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

This statement and the other accompanying material have demonstrated that the proposal is in accordance with the Local Plan policy and national policy set out in the NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

In conclusion, the application is in respect of replacing the existing electronic communications base station at Ashbrow Mills is necessary to maintain 4G coverage and provide a vital 5G network that supports public services.

Contact Details

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		(on behalf of above operator)	