

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Knowsley Industrial Park	Site Address:	Gladeswood Road Knowsley Industrial Park Liverpool L33 7BB
NGR:	E: 342954 N: 398335		
Site Ref Number:	KSY128 - 10102015	Site Type: Macro	NTQ Replacement

2. Pre-Application Check List

Site Selection

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

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	30 th June 2026
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green		
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Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Further consultation has also been carried out with the Northwood Ward Councillors.

Summary of outcome/Main issues raised:

No responses had been received at the time of submission.

School/College

Location of site in relation to school/college:

There are no schools in close proximity to the site.

Outline of consultation carried out with school/college:

N/A

Summary of outcome/Main issues raised:

N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (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:		
N/A		

Site Provider Letter

Site Provider Letter enclosed?	Yes	
Date served:	29 th July 2026	

3. Proposed Development

The proposed site:
It is imperative to consider that this proposal is to replace an existing installation and is not a new additional installation. The need for this lattice tower stems from MBNL having been issued with an NTQ (Notice to Quit) on their existing site and thus this new mast is urgently required to maintain coverage.

The existing NTQ site is KSY022 Knowsley House, a semi-redundant building off Charleywood Road. The building is in a state of disrepair and has posed H&S issues over the last years. The new landlords have recently gain planning through appeal for conversion into a Hotel. Planning ref: 20/00020/FUL.

The proposed site is situated on Gladeswood Road, Knowsley Industrial Park, Liverpool, L33 7BB and can be seen below in figures 2-4.

The proposal is for the installation of a new 35m high FLI ATS1300 Lattice Tower and associated antennas that will provide continued and improved coverage for EE, H3G LTE and ESN for this area of Knowsley when the existing installation at Knowsley House is decommissioned. The proposed new facility will require the installation of a limited number of equipment cabinet housing radio equipment at ground level and in close proximity to the base of the pole.

The proposed site is located within the Knowsley Industrial Park; there are a large number of commercial premises on the Industrial Park, changing technology will mean greater demand is put on the Telecommunications Network. The site has been carefully selected in a position that benefits from being surrounded by commercial establishments, with no residential properties in the immediate vicinity.

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

Site Ref:	KSY128	Site Address:	Gladeswood Road, Knowsley Ind. Park, Liverpool, L33 7BB
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Local Planning Authority: Knowsley Metropolitan Borough Council (MBC)

Development Plan: Knowsley Local Plan Core Strategy (2016) / Knowsley
Replacement Unitary Development Plan (saved policies) (2006)

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



Figure 2



Figure 3



Figure 4



Site and its surrounds

Policy Relevant to the Development Site:

The site is designated as being within the settlement boundary, with urban uses to the north, east, south, and west. The site designation is not a material consideration.

Knowsley MBC does have a specific telecoms policy. This, together with the NPPF, is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Policy **CS4** of the Local Plan reads:

“Economy and Employment

Overall Employment Development Strategy

1) Planning, site assembly and other available interventions will be used to:

h) Encourage homeworking through improvements to digital communications and telecommunications infrastructure.”

Policy **ENV8** of the Local Plan reads:

“TELECOMMUNICATIONS DEVELOPMENTS

1. Proposals for new telecommunications masts and associated antennae and buildings will not be permitted unless the applicant has demonstrated that the following criteria would be satisfied:

a) Where the proposal is for a free standing mast, the need for the development could not, for technical reasons, be met in a more environmentally acceptable manner by:

- Sharing an existing mast or site,
- Erecting antennae on an existing building or other structure;

b) The development would not, by reason of its scale, siting or design, have an unacceptable impact on the character or appearance of the surrounding area, or the amenity of nearby residents.

2. New telecommunications development will not be permitted within environmentally sensitive areas, such as Conservation Areas, residential areas or the Green Belt, unless the applicant has demonstrated that there are no other suitable alternative sites outside such areas and that appropriate steps have been taken to minimise any visual impact through careful siting, design and screening.

3. Applications for development by telecommunications code system operators must be accompanied by:

- a) Evidence that the proposal would comply with all relevant ICNIRP14 Standards (or future guidance which may supersede the current guidelines), taking into account any cumulative emissions from other nearby telecommunications equipment;
- b) Evidence of how the proposal fits into the wider network, regionally and nationally.
- c) Where the telecommunication development would be on or near a school or college site, evidence that the governing body of the relevant school or college has been consulted.”

The proposed development at this site is required to deliver the requisite level of electronic communication service on a single site that is to be adapted to accommodate multiple users (so enable future site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location (the site being as physically distant from lines of sight from residential uses as possible in this part of the Borough / industrial in character). The form and design of the proposed configuration would not appear out of context in this location (being seen as a telecommunications installation in a location where such infrastructure would be appropriate / not unusual), so according with wider Development Plan policy, and would ensure the integrity, character and setting of the area is fully maintained.

In addition to the above, Paragraph 119 of the NPPF (2024) states:

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

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

Paragraph 122 states that

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

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

The public benefits of a greatly enhanced communications network for businesses, residents and visitors alike in this location would qualify as a substantial benefit with near benign change or impact on amenity or on the character of the area.

The enhanced digital service would very much accord with the objectives of the Development Plan policy.

The proposal fully accords with the requirements of the NPPF.

RADIO PLANNING AND PROPAGATION

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

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

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

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

Clutter

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

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

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

Tree Clutter

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

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

Signal variation throughout the seasons is also a practical concern. Leaves on trees in the spring and summer can cause shadowing and reduce radio voice quality and increase the number of dropped calls.

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

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

Propagation Models

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

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

Coverage Planning Tools

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

Network Changes

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

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

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

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

Site Height increases

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

Maintaining existing coverage

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

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

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

Clutter changes

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

ICNIRP Compliance

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

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA upon request.

Type of Structure

Description:

Proposed 35m high FLI ATS1300 lattice tower on new 6.85x6.85x1.2m deep concrete base with 6No. Antennas at 0°/120°/220° & proposed 4No Ø600 dishes. RRUs and BOBs to be fixed to support poles below antennas.

Proposed EE & H3G GPS nodes fixed to top of gantry poles.

Proposed EE/H3G MK5B Link/AC cabinet on separate concrete base. Cabinet to be mounted on 200 high steel plinth.

Proposed EE 2No unilateral cabinets on tower base.

Proposed H3G unilateral cabinet on tower base.

Proposed 2.4m high ClearVu 44 fence c/w 3.0m wide double gates.

Proposed stone chippings compound finish.

Proposed 450 wide o/h cable ladder & droppers on 3.0m high support posts c/w 75 wide tray under for power and Tx.

Overall Height:	35.0m AGL
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Height of existing building	N/A
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Equipment Housing:

Length:	See drawings
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Width:	See drawings
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Height:	See drawings
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Materials

Tower/mast etc – type of material and external colour:	See drawings
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Equipment housing – type of material and external colour:	See drawings
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Reasons for choice of design:

The proposed installation is for a 35m high FLI ATS1300 lattice tower which will house both EE and H3G LTE. The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF.

In keeping with the National Planning Policy Framework (NPPF December 2024). guidelines of using high quality communications infrastructure the proposed design has been selected to help minimise the visual impact upon the locale, by locating it on the Industrial Estate the applicant is endeavouring to minimise the visual impact on surrounding residential areas.

4. Technical Information

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

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for EE Ltd in order to improve coverage in the Knowsley area of Liverpool. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale. Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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

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

This sequential approach is outlined below:

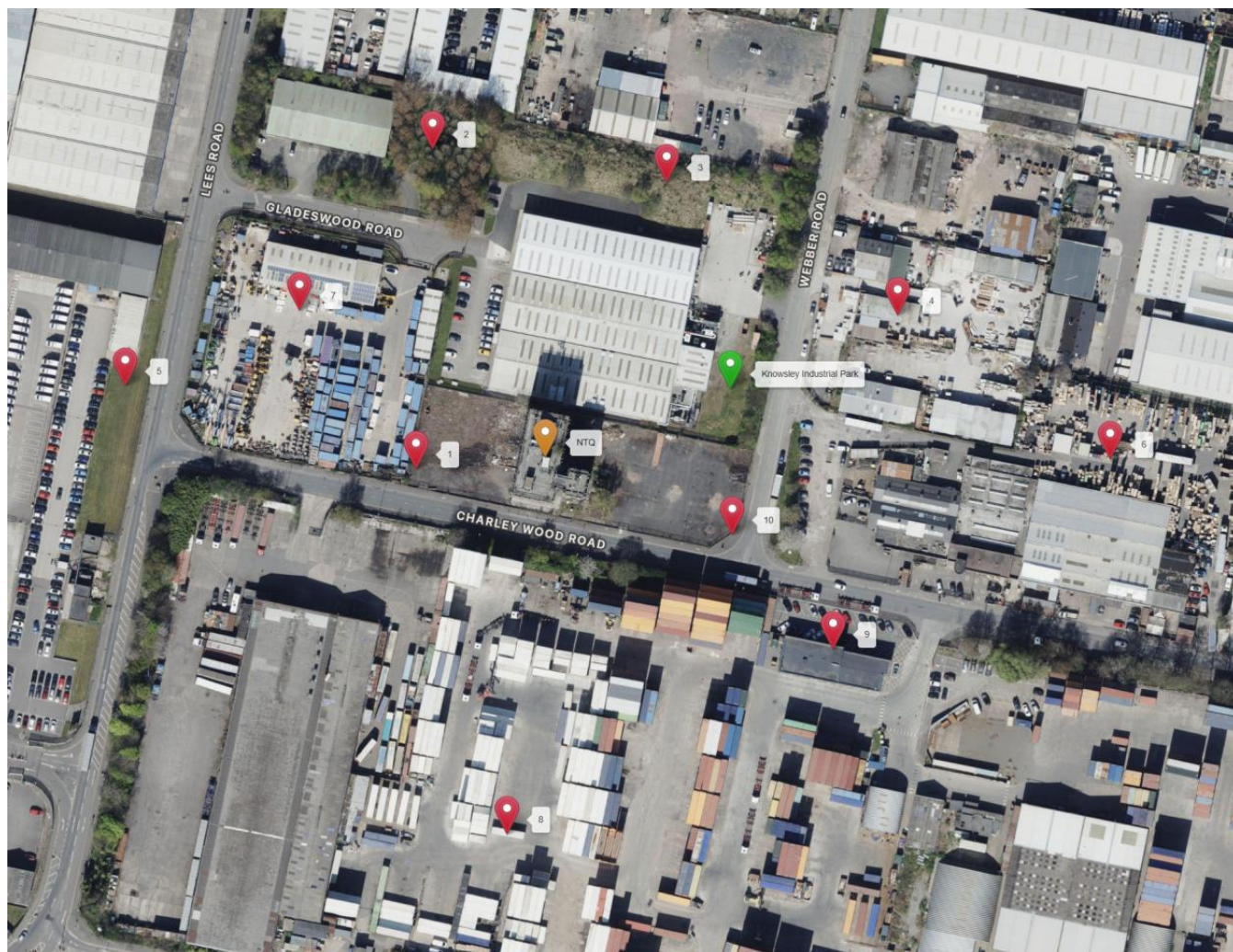
- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

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

Site Type	Site Name and Address	NGR	Reason for not choosing
D1	Knowsley House - GF	342837, 398305	A ground based mast was considered on the same land as the NTQ rooftop; however the SP has planning to convert the building into a hotel with the ground areas to be developed into car parking, landscaping areas.
D2	Massey Coldbeck - GF	342845, 398421	Commercial unit occupied by Massey Coldbeck. The location proposed would involve several trees being removed which would be unnecessary given the other location available.
D3	Bodycote - GF	342929, 398408	This location looks good from Google Maps, however when we attended site it was found to be bunding/spoil which would require removal and land remediation. Agreed to the subject sites location instead.
D4	North West Fencing Products - GF	343013, 398358	This was considered as a good option, however a c10m x 10m would obstruct access around the site and disrupt the landowners business, therefore discounted.
D5	Ocado Knowsley - GF	342732, 398336	The land is split under different ownerships down the middle of the landscaping strip, which would be very difficult to acquire from a legal perspective.
D6	Venture Works - GF	343090, 398305	This is a very busy yard which no space to install a telecommunications compound without obstructing the landowner and their business.
D7	CW Plant Hire - GF	342796, 398363	The site is used for plant storage with constant movements. I spoke with tenants who advised they did not have any space to house the equipment due to business use.
D8	Eldapoint Yard - GF	342869, 398172	Large busy site which is used for shipping container storage. The containers are stacked on each other to around 5-6 when I surveyed the area. This could potentially cause ICNIRP issues and block coverage if a mast was built in close proximity.
D9	Eldapoint Rooftop – RT	342988, 398238	Low office building of around 8m, which will not provide the require coverage to replace the NTQ site therefore discounted.

D10	Webber Road SW – SW	342952, 398280	Streetworks site outside the NTQ site. Given the height of the NTQ site, a 20m SW site would not provide the required coverage. No streetworks site are considered due to restrictions in height.
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Figure 5



<https://gridreferencefinder.com/os.php?gr=SJ4295498335|Proposed s Replacement s Site|1,SJ4283798305|D1|1,SJ4284598421|D2|1,SJ4292998408|D3|1,SJ4301398358|D4|1,SJ4273298336|D5|1,SJ4309098305|D6|1,SJ4279698363|D7|1,SJ4286998172|D8|1,SJ4298898238|D9|1,SJ4295298280|D10|1&v=r&labels=1>

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

N/A

7. Additional Relevant Information

Background to the Proposal

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

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

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

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

DEVELOPMENT PLAN POLICY.

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

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY

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

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

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

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

Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraphs below clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

NPPF Paragraph 119 states:

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

It continues in Paragraph 120:

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

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

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

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

Conclusion

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

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

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

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

Damian Hosker BA (Hons) MA MRTPI

Contact Details

Name: (Agent)	Telephone:	Emailed on request
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Signed:	Date:	30 th July 2026
Position:	Principal Planner	Company: WHP (on behalf of above operator)