

6. FULL APPLICATION – INSTALLATION OF A 15.0M PHONE MAST SUPPORTING 3 NO ANTENNA 2 NO DISHES, EQUIPMENT STORE AND ANCILLARY DEVELOPMENT, CLIFFE HOUSE FARM, HIGH BRADFIELD (NP/S/0519/0475, JRS)

APPLICANT: Home Office

Summary

1. The application is for a mast to provide emergency services and other telecommunications coverage in an area with no coverage. The mast would have an unacceptable landscape impact and is recommended for refusal.

Site and Surroundings

2. The application site is located at Cliffe House Farm which is located in open countryside in an elevated position on the northern slope of the Loxley Valley, approximately 1.1km to the south east of High Bradfield and 870m to the north of Damflask Reservoir.
3. The farm comprises a relatively recently erected modern agricultural building, the excavations for an additional building, and a smaller range of older sheds and sits close to the edge of an escarpment on the hillside. Immediately to the south of the agricultural buildings there are two detached dwellings, Hill Top and the original Cliffe House Farmhouse. There are two accesses serving the building group. The first is via a narrow track off Loxley Road to the south west. This serves the dwellings and the farm buildings and also carries a public footpath which runs past the south side of the new farm building into the fields east of the farm. The second and main access for the farm buildings comes down off Kirk Edge Road to the north and also carries a public footpath which links with one running west to east through the site; this is the access to the application site.
4. From the west the land falls away from the site and on this side the buildings which make up the property are partly screened by a combination of the landform, tree cover on the slopes of the escarpment and by a stand of mature trees on the south west corner of the building group. The site and nearby farm buildings are clearly visible from Kirk Edge Road to the north. The proposed site for the proposed mast is small area of land to the west of the access track and adjacent to an existing earth mound and planting which run along the edge of the escarpment. The site of the building currently under construction lies to the east of the access track.

Proposal

5. This application seeks planning permission for the erection of a 15 metre high lattice tower supporting three antenna and two dishes, the erection of an equipment store and ancillary development.
6. The proposal also involves the installation of three Home Office equipment cabinets, contained within a foul weather enclosure; one electrical meter cabinet; one generator and one pole mounted 1200mm satellite dish within a 10mx10m compound surrounded by a 1.8m high mesh compound fence.
7. The proposal is required as part of the Extended Area Services network, an integral part of the Emergency Services Mobile Communications Programme. The site will provide uninterrupted, high quality emergency communications to the target area of Bradfield, the majority of the roads in the area Minor Roads (as defined by ESN), and approximately 3Km of the B6077, Major Road (as defined by ESN) from Malin Bridge to Dungworth is provided with coverage. Coverage is also provided to Bradfield Moors, Ughill Moor,

Broomhead Moor and part of Derwent Moor and all minor roads and surrounding area within the coverage footprint.

8. A supporting statement submitted with the application explains: *“The new blue light service, to be known as the Emergency Services Network (ESN), will be delivered across England, Scotland and Wales. ESN is being procured competitively to provide a high-quality service that makes full use of the latest 4th generation (4G) technology in the telecoms sector and has a number of related projects to provide the capability, resilience and security required for what will be a key part of the Critical National Infrastructure (CNI) supporting public safety.*
9. *Most of the UK will be covered directly by EE who are in the process of upgrading their commercial networks to deliver ESN. Largely because of demographics and geography, there exists a number of areas in the country which have not been populated with mobile communications infrastructure. It is these ‘not-spots’ which are addressed by the Extended Area Services (EAS) project.*
10. *The EAS project extends the coverage provided by EE by procuring, on behalf of the Home Office, telecommunications infrastructure in these defined but primarily rural, remote and commercially unviable areas where little or no MNO coverage exists. The Home Office is acting as the prime contractor to contract with Acquisition, Design and Build (ADB) suppliers (Lendlease for EAS sites) and will further contract with transmission suppliers for their backhaul. Sharing existing telecommunications sites is being negotiated where possible, but EAS coverage needs will require mainly new greenfield sites, which the Home Office will then own and operate for Government use. EE will install their active equipment on these EAS sites and connect this to their core ESN network.*
11. *EE are at liberty to offer their own commercial services to the general public from these EAS sites but are under no obligation to do so. The Home Office understands that a number of stakeholders, not least local residents, would be in favour of receiving a commercial service from the new sites so it has undertaken to build, wherever possible, an enhanced design so as to allow subsequent mobile network operators to share the sites and provide commercial services with the minimum of further works required. The site to which this application refers is one of these where an enhanced, future-proofed design has been submitted.”*

RECOMMENDATION:

That the application be REFUSED for the following reasons:

1. **The proposed base station would be a relatively tall structure within this protected landscape and would be prominent from many viewpoints within the Loxley Valley. The proposed development would have a harmful impact upon the scenic beauty of the landscape contrary to Core Strategy policies GSP1, GSP3, and L1 and Development Management DPD policy DMU4.**
2. **Whilst the proposed development would provide emergency services coverage and would provide economic and social benefits by facilitating the provision of mobile communications to the local community, it is considered that the harm that has been identified would outweigh the public benefits of the development and that therefore the proposal does not represent sustainable development and that approval would be contrary to the National Planning Policy Framework.**

Key Issues

12. The impact of the development upon the scenic beauty and other valued characteristics of the National Park.
13. Whether the need for the development, notably emergency services cover, outweighs the harm identified.
14. The economic and social benefits of the development.

History

15. 2012: NP/S/0712/0725: Planning permission granted conditionally for demolition of a collection of existing concrete framed agricultural buildings at Cliffe House Farm and provision of a single replacement steel framed agricultural building with associated vehicle turning area and associated landscaping. This building was completed in 2014.
16. 2015: NP/S/1214/1273: Planning permission refused for the erection of two agricultural buildings at Cliffe House Farm on the grounds of adverse landscape impact and adverse impact upon the setting of nearby listed buildings. A subsequent appeal was dismissed.
17. 2015: NP/S/0715/0663: Planning permission refused for the erection of a 20 metre high shared lattice telecommunications mast with ancillary development. The proposal was on the current application site and was part of the Government's Mobile Infrastructure Project (MIP) which sought to cover "not spots", that is those areas where there is no mobile coverage by any operator
18. 2016: NP/S/0316/0281: Planning permission refused for the erection of an agricultural building to the north of the building approved in 2012. A subsequent appeal was allowed in 2017 and the building is now under construction.

Consultations

19. Highway Authority – No response to date.
20. City Council – No response to date.
21. Parish Council – *"The Parish Council has no objections to the installation of the mast but would suggest a more sympathetic installation could be used."*

Representations

22. One letter of representation have been received. This states:
23. *"Due to the refusal of the previous application NP/S/0715/0663 for a 20m mast on exactly the same site as this application for a 15m mast; a detailed comparison with that application should be undertaken in order to judge whether the reasons for refusal have been overcome. Given that the site is exactly the same there is a marked difference in the treescape on the drawings of the proposed masts which needs checking with a site visit. Our comments on the previous application still stand"*.

Main Policies

24. Relevant Core Strategy policies: GSP1, GSP3, DS1, L1 and L3

25. Relevant Development management Plan policies: DMU4

26. National Planning Policy Framework

27. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales which are to conserve and enhance the natural beauty, wildlife and cultural heritage and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.

28. The National Planning Policy Framework (NPPF) has been revised (2019). This replaces the previous document (2012) with immediate effect. The Government's intention is that the document should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In particular Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues.

29. In relation to telecommunications development, paragraph 113 of NPPF states: *"The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. 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"*.

Development Plan

30. The recently adopted Development Management DPD (2019) includes a section on telecommunications development. This states:

31. *10.18 The nature of the landscapes of the National Park makes the assimilation of telecommunications infrastructure and associated equipment very difficult without visual harm.*

32. *10.19 Modern telecommunications networks are useful in reducing the need to travel, by allowing for home working. They can be a vital aid to business and to emergency services and the management of traffic. However, as with other utility company development, the National Park Authority must carefully avoid harmful impacts arising from this type of development, including that needed to improve services within the National Park itself. Telecommunications development proposed within the National Park to meet an external national need, rather than to improve services within it, may well be of a scale which would cause significant and damaging visual harm and in such circumstances alternative less damaging locations should be sought.*

33. *10.20 In exceptional circumstances where it can be demonstrated that telecommunications infrastructure is essential, rather than desirable to the industry, the National Park Authority will seek to achieve the least environmentally damaging but operationally acceptable location. It will request that the full range of technical information is supplied by the company regarding the siting, size and design of the equipment proposed to facilitate evaluation of the least obtrusive but technically feasible development in line with guidance in the NPPF.*

34. 10.21 New equipment should always be mounted on an existing structure if technically possible and development should be located at the least obtrusive site. Particular care is needed to avoid damaging the sense of remoteness of the higher hills, moorlands, edges or other prominent and skyline sites. Upland or elevated agricultural buildings, which are not uncommon in the National Park, may provide a suitable alternative to new structures in the landscape. If necessary, the National Park Authority will seek expert advice to help assess and minimise the impact of the design and siting of telecommunications infrastructure. Evidence will be required to demonstrate that telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest. Fixed line Code Operators should refer to the Code of Practice for Cabinet siting and Pole siting, June 2013.
35. 10.22 Mobile telephone companies may often be able to locate antennae (or any other transmitting or receiving equipment) on an existing building rather than erect a purpose built mast. The National Park Authority would support such an approach where the antennae can be mounted with minimum visual and architectural impact. Mounting antennae on a Listed Building will usually be inappropriate (see policy DM07).

Policy DMU4 Telecommunications infrastructure

- a. Development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the effect on the landscape or other valued characteristics of the National Park.
- b. Development proposals for radio and telecommunications must be supported by evidence to justify the proposed development.
- c. Telecommunications infrastructure will be permitted provided that:
 - i. the landscape, built heritage or other valued characteristics of the National Park are not harmed;
 - ii. it is not feasible to locate the development outside the National Park where it would have less impact; and
 - iii. the least obtrusive or damaging, technically practicable location, size, design and colouring of the structure and any ancillary equipment, together with appropriate landscaping, can be secured.
- d. Wherever possible, and where a reduction in the overall impact on the National Park can be achieved, telecommunications equipment should be mounted on existing masts, buildings and structures. Telecommunications equipment that extends above the roofline of a building on which it is mounted will only be allowed where it is the least damaging alternative.
- e. Substantial new development such as a mast or building for the remote operation and monitoring of equipment or plant not part of the code-system operators' network will not be permitted.

Assessment

36. The application proposes a 15 metre high lattice telecommunications mast to provide emergency services cover to the area around Bradfield. It will also be capable of providing mobile coverage for EE as part of the commercial network available to its customers. Bradfield is currently a "not spot", with no mobile coverage from any operators. The Home Office-led EAS network will replace the existing Airwave emergency services network. The site is in an elevated location on the northern side of the valley, to the north-east of the village of High Bradfield.
37. Following pre-application discussions with officers about the possible prominence of a mast in this location, the applicants have submitted photomontages to support the application; these are referred to below. The application also includes a list of discounted

sites these are alternative sites which have been considered but which were discounted for one of more of a number of reasons. These include technical and reasons, with the alternative sites either not roving the required coverage or being in physically unsuitable locations. The application is also supported by a certificate which states that, when operational, the International Commission guidelines for public exposure will be met. Consequently, in accordance with the National Planning Policy Framework, there are no concerns that the development would have any adverse impact upon public health.

38. It is considered that the main issue in this case is the impact of the proposed development upon the valued characteristics of the National Park including the scenic beauty of the landscape and the setting of nearby heritage assets and whether the visual impact of the mast would be outweighed by the public benefits.

Impact of the proposed development

39. Relevant policies in the development plan offer support in principle for the erection of new telecommunications infrastructure provided that the development does not harm the valued characteristics of the National Park and where it is not feasible to site the development outside the National Park. The Authority's policies are consistent with the Framework which is supportive of the development of communication networks where justified but also states that great weight should be given to conserving the Peak District National Park.
40. The application site is located adjacent to land and buildings used as part of the agricultural unit associated with Cliffe House Farm. The site is located in an elevated position on a ridge which forms part of the northern slope of the Loxley Valley. It should be noted, however, that since the refusal of the application for a taller, 25 metre mast in 2015, a second large agricultural building has been allowed on appeal and is currently under construction immediately to the east of the access track.
41. The proposed base station which would mount the telecommunications antenna would have a maximum height of 15m above the adjacent ground level. The proposed structure would be taller than the adjacent earth mound and tree planting (approximately 8 m high) and consequently would be clearly visible within the valley from a number of nearby vantage points. The development would also be clearly visible from the local public footpath network which is well used by local people and by visitors to the National Park. The application states:
42. *".. following the instigation of pre-application discussions with the LPA we have reduced the height of the mast to 15m which is the lowest we can go whilst still achieving the required coverage. The design of the mast to our slimmest available lattice structure which minimises the visual impact. The applicant considers the proposed location, with existing tree screening to the west and proposed development to the east is the best available location. We have considered locations to the south towards the trees but the natural drop in elevation compromises radio coverage and would require a significantly taller structure".*
43. In the pre-application discussions officers advised the applicants to prepare and submit photomontages of the proposed development from a number of vantage points in the locality. The application is therefore accompanied by photomontages which illustrate the installation from Kirk Edge Road (north of the site, looking downhill), from Loxley Road to the south-west, and Hoarstones Road, looking across the valley from the south. These demonstrate that whilst in the longer views across the valley the installation is less visible by virtue of the tree cover of its lower half and the distance involved, the views from Loxley Road and Kirk Edge Road are more significant. It is considered clear that by virtue of the height of the proposed structure that it would be visually prominent in these

view points and that the development would appear as a relatively tall, man-made structure. It is acknowledged that the impact of the installation is partly mitigated by the existing trees to the west and the substantial agricultural buildings erected and under construction at Cliffe Farm, but nonetheless, the mast would be visually prominent.

44. It is also acknowledged that telecommunications masts, by their nature and technical requirements are usually visible. Officers have suggested that an alternative design is more likely to be acceptable, but the applicant's agents have advised that the technical requirements of the service (the need for relatively substantial antennae up to 15 metres) would not permit a more discreet design, such as an imitation telegraph pole. The supporting statement says that the dimensions of the proposed mast are the thinnest available to support the required antennas and associated equipment at this geographical location, while also having structural capacity to accommodate additional equipment, if required by additional operators or future changes to the emergency services communications network.
45. Notwithstanding this, it is considered that the proposed development would result in a harmful impact upon the scenic beauty of the National Park in conflict with Core Strategy policies GSP1, GSP3 and L1 and DM DPD policy DMU4.
46. The site is adjacent to the existing farm track which would provide access from Kirk Edge Road. Access visibility from the track is good and likely levels of traffic to maintain the development would be very low. Therefore there are no concerns that the development would have any harmful impact upon highway safety. Given the distance from the site to the nearest neighbouring properties and Cliffe House Farm there are no concerns that the proposal would have a harmful impact upon the privacy, security or amenity of neighbouring properties.
47. The harm in this case would be "less than substantial" and therefore it is appropriate to weigh any public benefits of the proposal against the harm that has been identified.

Benefits of the proposed development

48. As mentioned earlier in the report, the proposed telecommunications mast has come forward as part of the Home Office's Extended Area Services network, which is an integral part of the Emergency Services Mobile Communications Programme. The site will provide uninterrupted, high quality emergency communications to the target area of Bradfield, the majority of the roads in the area Minor Roads (as defined by ESN), and approximately 3 km of the B6077, Major Road (as defined by ESN) from Malin Bridge to Dungworth is provided with coverage. Coverage is also provided to Bradfield Moors, Ughill Moor, Broomhead Moor and part of Derwent Moor and all minor roads and surrounding area within the coverage footprint. The site would also provide EE with the option of commercial mobile coverage is an area where there is currently no mobile coverage.
49. The benefits of the proposed development would therefore be to provide emergency services coverage (to replace the existing Airwave network, which is being replaced) and to give the possibility of high speed wireless communications to an area where there is no coverage currently available. Officers agree that both of these would be likely to offer significant public safety, economic and social benefits for members of the public living and working within the affected area.
50. The National Planning Policy Framework does place emphasis upon the need to encourage the continued rollout and improvement of digital infrastructure network, however, great weight also needs to be given to the conservation of the National Park and the setting of heritage assets. Therefore for the proposals to be consistent with the

Framework it must also be demonstrated that the development will conserve the valued characteristics of the Peak District National Park including the scenic beauty of its landscape and the setting of its heritage assets.

51. In this case it is considered that the proposed development would result in harmful impacts upon the scenic beauty of the landscape and would also harm the setting of the heritage assets listed above. The public benefits of the development are significant but it is considered that the impacts of the proposed development would outweigh the benefits in this case.
52. While the loss of an opportunity to provide emergency service and mobile coverage is very unfortunate it is considered that this in itself does not justify development which would have an overriding harmful impact upon the National Park contrary to local and national policies. Officers have been willing to consider other, less prominent solutions with the applicant's agents, but, as explained above, they consider that these do not provide technically suitable solutions.

Conclusion

53. It is considered that the proposed development would be a relatively tall and prominent man-made structure which would have an adverse impact upon the scenic beauty of the surrounding landscape.
54. The proposal would result in significant public benefits related to the provision of emergency services coverage and the possibility of mobile telecommunication infrastructure in a "not spot". This would be likely to result in significant public safety, economic and social benefits for members of the public living and working within the affected area.
55. However, great weight must be given to the desirability of conserving the valued characteristics of the National Park including the scenic beauty of its landscape and the setting of its heritage assets. In this case it is considered that any approval of the development would have a significant harmful impact upon the National Park and it is considered that this harm would outweigh the benefits of approving the proposal.
56. It is therefore considered that for the above reasons the proposed development is contrary to Core Strategy policies GSP1, GSP3, L1 and Development Management DPD policy DMU4.
57. It is therefore recommended that the application be refused.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

Nil

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