

6. FULL APPLICATION: TELECOM EQUIPMENT INSTALLATION, 30M MAST AND ANCILLARY FEATURES ON LAND ADJACENT TO SNAKE PASS, SNAKE ROAD SHEFFIELD, NP/HPK/0820/0764, JK

APPLICANT: THE HOME OFFICE

1. **Summary**

2. The application site lies within a coniferous plantation adjacent the A57 Snake Pass road and some 2km north of the Snake Pass Inn.
3. The proposal is to erect a 30m high telecoms mast (antenna tops reach 31.3m high) together a ground level equipment compound. Access would be via a shared new entrance and track up from the A57 for telecoms and forestry use along with a spur off the new track to a second new entrance to accommodate timber harvesting vehicles.
4. This site, along with the other application for similar mast on this agenda, is to provide essential coverage for the new blue light Emergency Service Network along this stretch of the A57 Snake Road.
5. We consider the mast is capable of being accommodated satisfactorily within this coniferous plantation setting as it stands now without causing harm to landscape. However, large sections of the plantation immediately north and south of the mast are due to be felled this year and within the next 5 years leaving the mast site in the open, just north of the edge of a smaller block of retained trees. The mast would therefore be considerably more exposed to view than represented in the application and would thus represent an intrusive and harmful feature upon the open landscape.
6. Long term control over the more surrounding trees which would currently provide essential screening for any new mast is necessary to make the development acceptable in planning terms. A Planning Obligation in the form of a Unilateral Undertaking is normally suggested to achieve this but we know from the nearby application that the landowner, Forestry England, is unable to agree to any restrictions.
7. Whilst our policies provide support in principle for telecoms infrastructure to deliver this essential emergency service, this is provided the valued characteristics of the National Park Landscape are not harmed. This proposal will not secure any control or management over the screening woodland essential to make the development acceptable and therefore we recommend that permission is refused.

8. **Site and Surroundings**

9. The application site is located at the northern end of the Snake Valley, approximately 2km north-west of the Snake Pass Inn. The proposed mast site would lie to the east of the A.57 on rising ground and set back 28m from the road within coniferous woodland managed by Forestry England.
10. There is currently no formal access from the road although the roadside post and wire fence bounding the plantation does have a timber gateway suggesting a former forestry access point, however this has revegetated through inactivity.

11. **Background**

12. The Emergency Services Mobile Communications Programme (ESMCP) is the Home Office led programme responsible for the new Emergency Services Network (ESN). It aims to provide a 4G integrated voice and broadband data communications service for the blue light emergency services. ESN has initially been deployed by enhancing an existing commercial network configured to give the three emergency services priority over other users. This proposal, like the mast approved last December above High Bradfield (with S106 securing a surrounding woodland management plan), and the other mast proposal on this agenda further south down the A57, is for the Extended Area Services (EAS). This is to provide additional infrastructure to extend the ESN into primarily remote and commercially unviable areas where little or no mobile network coverage exists.

13. **Proposal**

14. The construction of a telecommunications site comprising the erection of a 30m of high lattice mast within a fenced equipment compound.

15. The mast would carry antennae which would take the overall height of the mast structure to 31.3m along with two 600mm dishes all for the ESN (EAS). At ground level, the fenced compound (8m x 12m) would be surrounded by a 1.8m high meshed dark green fence topped with three strands of barbed wire. Within the compound there would be a small electricity meter cabinet and the larger equipment cabin along with a standby generator and satellite dish. The mast and equipment cabinets would all be coloured dark green (fir green RAL 6009). Gritstone filled gabion baskets would be utilised on the upslope and downslope sides of the compound to retain the sloping ground either side of flat compound which would be cut into the sloping ground.

16. From the compound an approx. 80m long shared use new track (3m) for forestry access and telecoms site access would lead southwards, firstly to a joint access to the A57 with a further section of (10m) wide extending southwards for forestry use only. This further forestry section would extend approx. 100m to the second entrance to the A57 (sited opposite an existing forestry access with wide bellmouth on the opposite site of the A57).

17. The track up to the compound would also extend just past the compound to facilitate forestry access into the plantation beyond. The tracks would be formed with gritstone gravel with tarmac at the entrances. A new drainage pipe would be installed under the track to maintain drainage to the existing culvert at the front of the site

18. The application is supported by the following documents/reports;

19. i) Photomontages

ii) The Dark Peak Forest Plan

iii) An Arboricultural Impact Assessment

iv) A Transport Statement

v) Further explanatory information/justification statement

vi) Detailed plans

vii) A certificate of conformity to radio wave exposure guidelines

20. RECOMMENDATION:

That the application be REFUSED for the following reason;

The ability of this site to successfully accommodate the proposed mast without harming the valued characteristics of the National Park landscape relies wholly upon the continued screening effect provided by the surrounding trees which are outside of the applicant's ownership and control. The majority of these trees are scheduled to be clear felled in the very near future as a result of being both a forestry crop and potentially as a result of disease affecting the larch. In the absence of a suitable mechanism to secure control over the long term retention and suitable management/planned replacement of the immediate surrounding tree cover, and to mitigate the potential loss of any larch to disease, the proposed mast would become an isolated and intrusive feature harming the special quality of the landscape and is therefore contrary to policies GSP1, GSP3, L1, DMU4C, DMC3, and the NPPF.

Furthermore in the absence of secure mechanism to control land outside the application site area necessary for the provision and maintenance of required access visibility sight lines the proposed access would pose a danger to highway users contrary to policy DMT3.

21. Key Issues

22. Whether the principle of the proposed development is acceptable.
23. The impact of the development upon the scenic beauty and other valued characteristics of the National Park.
24. Whether the need for the development, notably emergency services cover, outweighs any harm identified and taking into account the economic and social benefits of the development.

25. Planning History

26. In pre-application advice officers supported the current proposal in principle.

27. Relevant Nearby Planning History

28. 2001 – Application for a 25m high telecoms mast for the Airwave service sited 85m south of the current application site withdrawn around the same time as approval was issued for the alternative site just above the Snake Inn. Note this mast is subject to the other application on this agenda (NP/HPK/1020/0947) which seeks to replace it with a 35m mast.
29. 2005 - Nearby at Doctors Gate Culvert, and within the trees some 175m north of the current application site, temporary planning approval was given for an 18m high telecoms mast for Vodafone. The installation was never built and consent lapsed in 2010. Officers note the large application site area to encompass a block of trees which were conditioned to be retained and a management plan agreed to secure the screening effect.

30. Consultations

31. Highway Authority:

32. “There would not appear to be an existing vehicular access to the eastern side of Snake Road in the vicinity of proposed forestry track access, and whilst there is a gate in the approximate location of the northern site access, this will see an intensification in use and should accordingly be provided with appropriate visibility.
33. Snake Road is a classified road subject to a 50mph speed limit adjacent the site. Exit visibility sightlines should be 2.4m x 149m. The sightlines should be taken from a vertical eye-height of 1.05m over the adjacent nearside carriageway channel level and can only be taken over public highway or controlled land.
34. Such sightlines as mentioned above have not been demonstrated as part of the submission and it is not clear from the information submitted whether the applicant is in a position to achieve such sightlines due to the existing topography adjacent the highway potentially restricting emerging visibility. Accordingly, the applicant should provide additional information concerning the above.
35. Further to the above, whilst it is noted the southern access and track have been included at the request of Forestry England, a single shared access point may offer improved visibility opportunities as well as reducing the number of access points.
36. With regard to the accesses, whilst the proposed widths appear acceptable it is not clear what gradients are to be provided. Accesses should be no steeper than 1:14 for the first 5m from the nearside highway boundary and 1:10 thereafter, further information with regard to the above is sought. In addition, measures to prevent the flow of surface water onto the adjacent highway should be provided, together with further details with regard to existing drainage within the highway verge. It is also recommended that the first 5m of the proposed track not be surfaced with a loose material (i.e. unbound chippings or gravel etc.), currently only the highway verge width appears to be hard surfaced. Within the site there would appear to be sufficient space for vehicles to manoeuvre so as to ensure they both enter and exit the site in forward gear. It should be noted that number of the submitted plans appear to have been cropped and therefore can't see fully read, these plans include H/GA/103A/F, H/GA/103B/C, H/GA/103C/C and H/GA/104/E.
37. Finally, no details with regard to the proposed type and frequency of vehicles intended to use the accesses has been provided.
38. Therefore, before making my formal recommendations I would be obliged if you could ask the applicant to provide a detailed topographical survey demonstrating achievable visibility splays from site in both directions, along their entire length, together with revised plans and additional information addressing the above, in the meantime please hold the application in abeyance”.
39. Amended plans and a transport statement have now been submitted and the revised response of the Highway Authority is awaited.

40. Representations

41. One “holding objection” pending a suggestion for a landscape visual impact assessment has been received from the National Trust which makes the following summarised comments;
42. Recognises need so do not object to the principle of the development.
43. A pole would be preferable to a lattice mast due to the lesser visual impact...

dependent on the ability of a pole to support the required equipment.

44. The location allows for the mast to be part screened by surrounding woodland. However, the tree annotation used on the elevation drawings is misleading. A dashed line is used to show that the height of surrounding tree cover will only be half that of the mast. We are concerned that this could result in a significant visual impact and that no Landscape and Visual Impact Assessment has been submitted with which this impact may be assessed. We therefore request that an LVIA is produced to illustrate the landscape and visual impact of the proposal. If this is found to be unacceptable then the operator should consider the reduction in the height of the mast and/or use of one or more poles as an alternative to a lattice mast.
45. Without an LVIA it is not possible to know whether the mast will skyline in views and whether dark green is in fact the best colour for upper sections, if so we request that a planning condition is used to secure this in perpetuity,
46. As the application relies on the retention of the surrounding forestry woodland to provide a partial screen, we also request that a planning condition is used if possible to secure the future management of this woodland and prevent clear felling.

47. National Planning Policy Framework (NPPF)

48. 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.
49. The National Planning Policy Framework (NPPF) has been revised (2019). 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.
50. In relation to telecommunications development, Paragraph 112 of the framework document sets out the objectives of the Communications Infrastructure. It states that 'advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being'. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.
51. 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".

52. In the National Park, the development plan comprises the Authority's Core Strategy 2011 and the Development Management Policies (DMP), adopted May 2019. These Development Plan Policies provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. In this case, it is considered there are no significant conflicts between prevailing policies in the Development Plan and government guidance in the NPPF.

53. Main Development Plan Policies

54. Core Strategy

55. GSP1, GSP2 - *Securing National Park Purposes and sustainable development & Enhancing the National Park*. These policies jointly seek to secure national park legal purposes and duties through the conversion and enhancement of the National Park's landscape and its natural and heritage assets.

56. GSP3 - *Development Management Principles*. Requires that particular attention is paid to the impact on the character and setting of buildings and that the design is in accord with the Authority's Design Guide and development is appropriate to the character and appearance of the National Park.

57. DS1 - *Development Strategy*. Sets out that most new development will be directed into named settlements.

58. L1 - *Landscape character and valued characteristics*. Seeks to ensure that all development conserves and enhances valued landscape character and sites, features and species of biodiversity importance.

59. L3 - Core Strategy policy L3 requires that development must conserve and where appropriate enhance or reveal significance of archaeological, artistic or historic asset and their setting, including statutory designation and other heritage assets of international, national, regional or local importance or special interest.

60. Policy CC1 states that development must make the most efficient and sustainable use of land, buildings and natural resources.

61. Development Management Policies

62. The supporting text in the Development Management DPD includes a section on telecommunications development. This states:

63. *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.*

64. *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.*

65. *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.

66. *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.*

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.
67. The Code of Best Practice on Mobile Network Development in England (2016)
68. The Code of Best Practice provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England.

69. Assessment

70. Principle of Development

71. Proposed is the installation of a new telecommunications site with a lattice mast to carry antennae and dishes to deliver mobile communications and infill a current gap in service A57 'Snake Road', for the benefit of the emergency services network (ESN).
72. 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 National Planning Policy Framework which is supportive of the development of communication networks where justified but also states that great weight should be given to conserving National Park landscapes.
73. The essential need for coverage of the immediate local area along the A57 proves the need for a new mast in this location to provide the necessary service and meet policy. There are therefore no objections in principle to the development and it is considered that the main issue is the impact of the proposed development upon the valued characteristics and landscape of the National Park and whether the visual impact of the mast would be outweighed by the public benefits.

74. Design and Appearance

75. The proposed 30m high mast is a lightweight tapered lattice style, typical for these installations and entirely appropriate in this context. Given the site is currently within mature coniferous woodland a dark green colour with a matt finish would minimise the visual impact such that from any public views through the trees from the road it would not be particularly noticeable.
76. The antenna with the associated dishes would have to be located above the treeline in order to function so would be visible from certain viewpoints. The ground level equipment cabinets and emergency generator would all be contained within a modest compound surrounded by a 1.8m high chain link fence. We suggest that in any approval these along with the mast itself and all associated antenna, dishes and support structures are all conditioned to be coloured dark matt green to minimise their visual impact. On this basis there are no objections to the design or appearance of the mast or the proposed compound.
77. The construction of the access track and entrances onto the road use appropriate materials so there are no objections to these either on design grounds. The highway Authority requirements for access visibility splays can be accommodated without harm to wider landscape but would require some removal/re-contouring of the sloping verge on the northern side to accommodate.

78. Landscape Impacts

79. The submitted detailed elevation plan is somewhat confusing as to the relationship of the mast height to the top of the tree canopy. This is because it shows a dotted line around 15m above the ground or around half way up the mast which is annotated as 'Approx. outline of trees omitted for clarity' and also shows trees in the background some 10m higher. This is probably accounted for by the fact that the mast base would be some 12.5m above the road level and hence being on sloping ground there are a lower group of trees in front. The Arboricultural report states that the trees would normally reach 25m tall before being cropped and we agree with the submitted photomontages that demonstrate that around 5m of the mast would protrude above the trees that immediately surround the site.
80. Whilst the top of the mast would protrude above the current tree heights, it would be set

back from the road and if dark coloured would not be particularly intrusive although it would be more clearly visible in views from the south along a short length of the A57 from where it would skyline. From the north it would not be particularly noticeable. In longer views from the west of higher ground to the east the mast would be seen against the backdrop of forestry trees so would also not be prominent.

81. We therefore consider that this site for a single mast represents the least intrusive option for covering this upper section of the A.57 in the Snake Valley. However, the mast is only acceptable in this location because of the screening provided by the dense coniferous tree cover which, being part of a managed plantation is therefore subject to clear felling and replanting on a cyclical basis.
82. The submitted Arboricultural report should assess the impact of the whole development upon the trees as well as comment upon the surrounding felling regime. However, the only comment about the surrounding plantation is that the trees will be periodically cleared at which time the “mast, compound, track, retaining gabion walls and equipment will be wholly visible from the roadside and will be a dominant feature.”
83. In respect of the developments direct impact upon the individual trees, the plans in the report do not appear match the application layout plans and it appears to have just surveyed the earlier location discussed pre-application. The mast site in the application plans is now proposed some 50m or more further north from where the arboricultural report appears to show it. Consequently no weight can be attached to the Arboricultural report.
84. Forestry England’s; The Dark Peak Forestry Plan for the period 2017-2027 shows that the large block of plantation trees east of the A57 stretching from just south of the site all the way down to the layby at Hope Woodlands are marked to be clear felled this year. This explains the request by FE for the separate track for forestry access as part of the application. The block of trees to the north are also shown to be felled within 5 years which would appear (because the drawings are not precise enough to be altogether clear) to leave the mast site sitting right on the edge of a smaller retained block and therefore somewhat unnecessarily exposed.
85. This retained block is not due for removal until 2052-2056 and so is capable, subject to avoiding needing to be felled because of disease, of giving up to 35 years of cover if the mast were set well enough back within this block to maximise screening. Currently the proposed siting would be visually prominent and the mast would be an intrusive and harmful feature in the landscape after nearby felling. This is despite being on the edge of the retained block which would provide some cover and a back-drop in views from the north. The retained trees would however all be outside of any planning control and in any case the current siting would not maximise the potential screening effect available.
86. Consequently for officer’s to support the proposal we would need clarity as to the precise siting to ensure it maximises the screening available alongside a means to properly secure the retention of the screening. This would normally be via a Planning Obligation which would identify an appropriate block of trees to be retained and managed with replanting of appropriate disease resistant fast growing species. This would need to be in place throughout the lifetime of the development to maintain and indeed enhance the effectiveness of the screening tree cover.
87. Unfortunately, the applicants are unable to secure any formal agreement with Forestry England as landowner to secure the future of any trees around the site. We are also

aware that Forestry England are having significant issues with a plant disease in the Peak District affecting larch.

88. As a result they are currently having to clear fell large areas of affected trees in the Goyt Valley and state that it is likely that the Larch trees Snake Valley will become infected in the next few years and need felling. We recognise that depending upon densities and species mix, remaining non-larch species would also to be clear felled. Consequently Forestry England are unable to give any assurances that there would be continuous cover or enter into any formal agreements to retain trees or allow planting/management.
89. Whilst we understand the importance of the service to be provided and note our policies support the principle, in applying both the NPPF and our own local planning policies, it is clear that great weight needs to be applied to protection of the special landscape quality of the National Park landscape in difficult cases like this where there is conflict between competing interests.
90. In this case there is clear evidence that as submitted the siting of the mast would result in certain harm to landscape as a result of known forestry plans which will open up the proposed site to more public view resulting in harm to landscape which would not be outweighed by the need. Furthermore without secure control and management over the retained trees there is a likelihood for more substantial landscape harm. Re-siting the mast deeper into the retained woodland would maximise the current screening effect but would need to be the subject of a fresh application and would, in any case, need to be supported by a mechanism to secure and enhance the cover via an appropriate management plan to mitigate the likelihood of harm should the trees need to be felled before planned (in 30 years' time) should disease strike. Consequently the officer recommendation is to refuse on landscape grounds.

91. Amenity Impact

92. There are no nearby properties affected by the proposed development.

93. Highway Impact

94. An old and now overgrown forestry access exists but is no longer capable of use for forestry or telecoms without substantial improvement. Despite concerns from the Highway Authority about the twin accesses we understand the need for these based on the need for large lorries accessing the site to collect the harvested timber.
95. The need for appropriate visibility splays would appear to require some remodelling of the upward slope to gain the necessary sight lines. These works are not shown on the plans and would also be outside the applicants control as well as being outside the application site area. Although in principle there are no objections to the accesses and splays, which should be able to be accommodated in this landscape without harm, further detailed would be required in the event that the application were to be approved.
96. After construction and the tree felling has been completed the level of traffic associated with a telecoms site drops to the occasional maintenance visit and hence the forestry access and link road could be closed off and allowed to revegetate. In summary, whilst there are therefore no highway concerns over the access and traffic implications in principle, in the absence of a secure means to achieve the required visibility spays the application is currently open to objection on highway grounds.

97. Conclusion

98. The site would provide essential coverage for the new blue light Emergency Service Network where there is currently a gap in the planned service rollout. The site is currently capable of accommodating the mast and base equipment compound without landscape harm, however this relies upon the surrounding trees which currently provide essential screening.
99. However this essential tree screening upon which the acceptability of the site rests, alongside the provision of the access visibility sight lines cannot be secured. This is because the applicants have no ownership or control over the surrounding land.
100. Whilst in the short term the proposed mast and the associated equipment could be accommodated satisfactorily within this coniferous plantation, felling this year and in the next five will render it more exposed and it would become a more dominant and intrusive feature harming the valued landscape of the Park. Without long term control over the surrounding trees which provide essential screening for the site approval of the proposal would be contrary to our adopted policies and hence we recommend refusal of the application.

101. Human Rights

102. Any human rights issues have been considered and addressed in the preparation of this report.
103. List of Background Papers (not previously published)
104. Nil
105. Report author: John Keeley – North Area Planning Team Manager.