

**RESPONSE TO THE PROPOSED BASE STATION INSTALLATION AT
CTIL248803_TEF86950 HOLLY TREE FARM, HUDNALL
LANE, LITTLE GADDESSEN, HERTFORDSHIRE, HP4 1QE
NGR: 500015, 213048**

Thank you for giving us the opportunity to comment at the Pre- Planning Submission Consultation Stage for the above mast. Little Gaddesden Parish Council wish to raise objections to the proposed base station on the grounds set out below.

The stated reasons for the proposal is that there is a specific requirement for a radio base station at this location to address problem coverage areas, NOT SPOTS, for Smart Meter sites. New sites are required in areas where the existing network is not sufficient to allow smart meters to link to it. It is stated that this proposal will also improve coverage for existing Telefonica customers in the area and provide Telefonica Voice and Data.

In reaching its decision, the Parish Council consulted the residents of the village and we received 45 formal replies, 41 against the proposal, including the landowner, and 4 in favour. We have also conducted a Landscape and Visual Assessment to assist in the process, covering masts at both 25 and 20 metre heights.

The objections we wish to make are summarised below, but this does not represent the full basis for our objections, and these are contained in the summary of the Landscape and Visual Assessment Summary Statement at Appendix 1.

Siting of the Mast

The initial proposal was for the erection of a 25m Swann, lattice Tower, open headframe housing 3 x antenna, 2 x 0.3m microwave dishes and 2 Lancaster cabinets on concrete tower base. 1.8m high palisade fence and 1.0m wide access gate and includes a proposed timber close boarded fence parking spaces on field with access gate. It was stated that the height of the installation at 25m had been proposed to provide the best possible levels of coverage for the local area. In further correspondence it has been agreed that the mast will be reduced to 20 meters, but we are informed that this height cannot be reduced further as it is necessary to be above the tree lines and surrounding clutter in order to achieve the required coverage.

The Applicant states that the proposed ground-based location has been chosen in the absence of a viable alternative, including existing masts and rooftops, and has been selected in order to enable smart meters, NOT SPOTS, to be covered and to also provide the required level of Telefonica network coverage to Hudnall Lane and surrounding areas.

The location is in an Area of Outstanding Natural Beauty (AONB), on the edge of the village conservation area and is sited in an open agricultural field in close proximity to dwellings and public rights of way.

The mast will be highly visible, even at 20 metres, and will dominate the village and surrounding area (see Landscape and Visual Assessment Summary) and does not follow the Code of Best Practice on Mobile Network Development in England or the National Planning Policy Framework (NPPF).

Code of Best Practice on Mobile Network Development in England

Paragraph 2.7 of this Code refers to Section 5 of The National Planning Policy Framework ('NPPF') which sets out the principles on which this Code of Best Practice is based, and which include, inter alia:

- The numbers of radio and telecommunications masts and sites for such installations should be kept to a minimum consistent with the efficient operation of the network.
- Existing masts, buildings or other structures should be used unless the need for a new site has been justified; and
- Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.

It was originally stated that the site at Holly Tree Farm is **preferred** "as this hits the targeted area for smart meters". The original reason cited for the alternative site at Ashridge Golf club as being considered unsuitable was that it was lower than that at Holly Tree Farm (180m), but the Ordnance Survey map shows this site in fact goes to a higher altitude (190m).

When this was highlighted to Cornerstone, the reason now given for rejecting the Golf Club is that it is outside the search area. This clearly begs the question why it was considered in the first place if this is the case? Given that the Golf Course was originally considered as a possible location, the technical explanation as to why it was rejected is inadequate and no coverage analysis has been provided to support this statement. Other reasons cited are that the mast would need to be close to the Club House for services and it is in within the National Trust and Grade II* Registered Park and Garden. We submit that the Holly Tree Farm site is equally sensitive, being extremely close to a Grade II* listed building and in a similarly sensitive location, as set out in detail in the Landscape and Visual Assessment Summary.

No explanation has been given for why, unusually, only two possible locations were considered, and the primary reason for rejecting the Golf Club site is that it was within the National Trust and Grade II* Registered Park and Garden. This fact must have been known at the outset so, in essence, the Holly Tree Farm site was the only one considered. The explanation that this is simply your chosen location is inadequate to justify why only one location was considered and such a very small search area (location "86950) has been used, and which is almost wholly in the village (including the conservation area) and the AONB.

No satisfactory case has been put forward for the tower on a new site being the only solution to the stated local need, and no assessment of other alternative solutions has been provided. The answers to questions posed by the Parish Council would appear to indicate that this mast is, in fact, primarily required to provide coverage for Telefonica's national network.

We believe that consideration should be given to alternative technical solutions which would still meet the stated local needs without a 20 metre mast. These include:

1. Reducing the number of masts and sites by:
 - a. Analysing whether increasing the height or equipment at existing Telefonica masts "069548" (Well Farm) or "069547" (Great Gaddesden area) will achieve the desired 3G coverage within the village. The proposed mast is higher than the one at Well Farm (14.5 metres in height) which from your illustration, provides up to 2.5 kilometres of 3G indoor suburban coverage (your stated objective) and which is below the immediate treeline.

- b. Sharing of mast sites with other providers or provide a detailed explanation for the restricted search area.
- c. Using smart meters which are able to connect to any network or use smart meters connected to individual householder's Wi-Fi network.
- d. The use of small cells and antennae to provide improved O2 coverage within the village.
- e. Continue to utilise WiFi calling where there is no local O2 coverage.

Paragraph 2.8 in this Code also references the following key points in the NPPF:

- Protecting and enhancing valued landscapes.
- Sustaining and enhancing the significance of heritage assets

The National Planning Policy Framework (NPPF)

The following paragraphs of the NPPF are of relevance.

Paragraph 112:- "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".

No case has been made that the mast is to provide advanced, high quality and reliable communications infrastructure which is essential for economic support and social well-being' Furthermore, the NPPF states that "great weight must be given to conserving and enhancing landscape and scenic beauty". (NPPF172) which the scale and visibility of this proposed mast significantly contravenes.

Paragraph 113: This is referenced at paragraph 2.7 of the Code of Best Practice on Mobile Network Development in England as set out above.

Paragraph 114 (a):- Provides that evidence should be provided to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with, inter alia, air traffic services.

Paragraph 115 (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.

We submit that there has been no evidence provided that any investigation has been undertaken with regard to these options.

The AONB duty to conserve and enhance must be afforded 'great weight' in the balancing of issues. Slide 4 "LTE Plots Excluding 86950o2", shows that almost the entirety of the populated areas of Little Gaddesden are already covered by LTE (4G calling) for "Suburban Indoor" use. The effect of the proposed mast for LTE would be to extend indoor coverage to National Trust woodland where there is no indoor requirement, and where furthermore (according to O2's own website), there is already a "Good Outdoors" LTE calling service. It is stated that the proposed mast is required for 3G coverage for smart meters. However, this will give marginal benefit to O2 users only in terms of coverage in the village and the connection to smart meters can be provided by alternative methods.

The proposed mast site falls within the statutory Luton Airport Aerodrome Safeguarding Zone and the law requires that the airport must be consulted on the proposal, as does the National Planning Policy Framework. We understand that consultation has not yet taken place. The site is also directly under its operations flightpath.

It is stated that a safety light will not be needed at the Apex of the tower but as consultation has not yet been entered into with Luton airport, any such requirements should be identified prior to any planning submission due to the effect on Nature Conservation interests (particularly for bats and night flying moths which are noted to be of importance in the area), and on residents, particularly at night, if a light is necessary.

The level of noise created on the site has not yet been specified but the ambient noise level is extremely low, and any humming would have a serious detrimental effect on the adjacent dwellings, particularly at night.

We, therefore, submit that the negative impacts on a village with Historic connections in an AONB will significantly outweigh any benefit.

Concerns remain on the safety aspects, particularly if it is proposed to use it for 5G in future, due to the proximity of dwellings, footpaths, pedestrians, horse riders and cyclists so the relevant safety documentation should be provided. There is a well-used right of way within ten metres of the site and the proposed apparatus includes ground level plant that must be kept away from regular public passage. The proposal states the site is compliant and there are no publicly accessible areas which exceed safe guidelines and confirmation is requested that this has been assessed at this stage in relation to the lower 20 metre mast now proposed as after construction will be too late to safeguard this right of way.

Whilst it may be relevant to consider the economic aspects of the proposed siting of the mast, it is not a material planning consideration and would not be of sufficient weight to justify harm to interests of National Importance. Access with suitable vehicles across fields is normal practice and masts have been erected in difficult locations; the Telefonica mast "069547" (Great Gaddesden area) is a good example of this.

Appearance

The Applicant states that attention has been paid to acknowledge the nature of the area, whilst also meeting the needs of Telefónica and its customers. Telefónica also state that the existing foliage behind the site will provide partial screening of the mast from other viewpoints.

The full objections on appearance are set out in the Landscape and Visual Assessment summary which covers the conflicts with:

- The Landscape Character Assessment for Dacorum
- Natural England – Countryside Character Area 110
- The Chilterns Building Design Guide
- The Chilterns Conservation Board- Management Plan for the AONB
- The National Planning Policy Framework (NPPF)
- Dacorum Core Strategy

The key points from the Landscape and Visual Assessment are as follows.

The proposed mast site is in a sensitive and prominent location within the village and surrounding area which is described as rare, with a strong character, in Area 121 of the Dacorum Landscape Character Assessment.

It would be overly dominant in an ANOB and is just outside, but visible from, the village conservation area. It will not be screened effectively by the trees and it will have a serious detrimental effect on

the character of the village and surrounding area, including the demolition of a mature hedge to facilitate access from the Hudnall Lane and a car park (details for access which have not been specified).

Hudnall Lane is single track road for some distance from the junction with the village road to the proposed mast location. The suggested entrance coincides with the narrowing of the road and presents a significant road safety issue. This section is used by pedestrians, including pre-school and school children from the local childminder's property, dog walkers, horse riders and is on the Chiltern Cycle Way. It is also visible from public footpaths including the Regional footpaths of the Hertfordshire Way and the Chiltern Way which are used by visitors as well as local residents.

A survey was undertaken of the visual impact of a mast at 25 and 20 metre heights and tested by using a cherry picker from various local and wider landscape perspectives, see Section 7.1 of the Landscape and Visual Assessment Summary Statement. This included identifying significant views from the National Trust Ashridge Estate, which lies within the Grade II* Parks and Gardens Designation and 3 regional trails; Chilterns Way; Hertfordshire Way and the Chilterns Cycleway.

This assessment shows that far from being screened by trees, the mast, at both 25m and 20m height, would be visible over a wide area and in sight of a number of listed buildings (see Landscape and Visual Assessment Summary Statement paragraphs [Distant views para 7.2 & 8.4, Local Views para 7.3 & 8.4. The mast would be in very close proximity to, and visible from, 8 Listed Buildings including the adjacent Grade II* listed Manor House, the Grade 1 listed Parish Church and would affect the wider setting of Ashridge House Grade I Listed Building. The impact on other listed buildings and the Conservation Area is set out in the Landscape and Visual Assessment Summary at Sections 7.5, 7.6, 8.4 and 8.6.

The impact both physically and visually on Hudnall Lane is identified as of considerable concern (paras 7.4 & 8.9). The significant and widespread harm to the Countryside Character Area was identified in para 8.7 and to the Landscape Character Area in para 8.8, the inappropriateness of the proposals in relation to the Chilterns Design Guide is stated in paragraph 8.9.

The Landscape and Visual Appraisal identified significant and widespread harm would be caused by the proposed development at both 25m and 20m mast heights on the wider and local landscape visual setting and landscape character, together with the harm to the historical character and setting of the Ashridge Estate and village of Little Gaddesden. The scale of the mast proposals and the location as chosen by Cornerstone we state to be entirely inappropriate in relation to the sensitivity of the area and the high planning policy framework which comprehensively seeks to enhance and protect the visual, landscape and historical character and setting.

Conclusion

The proposal should be rejected as the owner of the land and the Parish Council both object. The stated local needs can be met using less intrusive alternative technologies and technical solutions. If the objective is to improve National coverage of the Telefonica network, then this should be separated from the local needs, and an alternative site away from the village be chosen for a mast of this size to meet this National need.

