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8th February 2021

Installation of a 22.5m steel lattice mast housing 3 antennas, 2 dish antennas, a GPS module, 3 radio equipment cabinets and associated meter cabinet within a fenced compound and enabling operational development works thereto at Penn Street Farm Penn Street Penn Buckinghamshire HP7 0PP

By planning portal upload only to Buckinghamshire CSB Planning Portal
My Ref.: F: Planning\Planning Applications\CBC

Buckinghamshire reference **PL/20/3652/FA**

The Chilterns Conservation Board (CCB) is grateful for the opportunity to submit brief comments on this application and raises **objection**. We recommend the application is withdrawn to facilitate further engagement and dialogue on an alternative location.

The principal development management objective is the conservation and enhancement of the special qualities of the Chilterns AONB. The legal and policy duties to deliver this are manifestly abundant in the CROW Act section 85, the existing Local Plan at LSQ1 and Core Strategy at Policy CS 22, the NPPF at 172 and in the AONB Management Plan 2019 - 2024.

The proposed site location is particularly sensitive and this is confirmed by the Bucks Landscape Character Assessment (Landscape Character Area LCA 18.2 Penn Rolling Farmland, which is acknowledged as exhibiting a sweeping topography and a strong sense of rural character.

The CCB accepts the applicant's point that the NPPF at 112 and 113 supports the installation of *'advanced, high quality and reliable communications infrastructure is essential for economic support and social well-being'* (NPPF 112). However, the need and importance of this infrastructure is rightly qualified by NPPF 113 and where new masts are required *'equipment should be sympathetically designed and camouflaged where appropriate'*. In any event the AONB duty of conserve and enhance must be afforded *'great weight'* in the balancing of issues.

The applicant's do acknowledge in their site specific supplementary information that the site falls within the AONB but then continue to consider the application of section 10 of the NPPF (Supporting High Quality Communications) but avoid any consideration of the 172 test, which is highly relevant.

We would also place weight on the AONB Management Plan and its policy DP 14.

This policy states that 'Avoid new or upgraded infrastructure (roads, railways, airports, pylons, masts etc.) which harm the AONB landscape, nature, air quality, tranquillity or the visitor experience. Fully assess impacts on the AONB, including increased recreation pressure, traffic, overflying and severance of ecological connectivity in the AONB. Avoid, mitigate and compensate to achieve a net gain for the AONB'.

Guidance by the Landscape Institute (Guidelines for Landscape and Visual Impact Assessment, 3rd edition) deals with the mitigation of landscape and visual effects and this includes primary measures (part of the project design) and secondary measures (considered in relation to the assessment of landscape and visual effects). In this case and taking forward the secondary measures approach, the CCB recommends that the application is withdrawn and alternative sites are considered by working with local stakeholders such as the Parish Council. An alternative appropriate location, therefore, can deliver the NPPF 113 requirements for concealment and the conservation of the special qualities of this 'intact, secluded and tranquil landscape'.

As the application stands the height of the structure, its matrix design and the clustering of equipment at its top, render its impact as incongruous in the landscape. Landscape character would be harmed as a consequence. The consequential harm to the AONB is further compounded by the web of footpaths that link Penn and Penn Street to Winchmore Hill, providing public access and benefit.

This is a matter than can be resolved, however.

The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of [CroW Act](#)).



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