



**Planning Statement**  
**Proposed Telecommunications Site ESN40157**

**Mork Clay Pigeon Shooting**

**Mork**

**St Briavels**

**GL15 6OH**

Prepared by

**gillanconsulting**  
planning and development

On behalf of

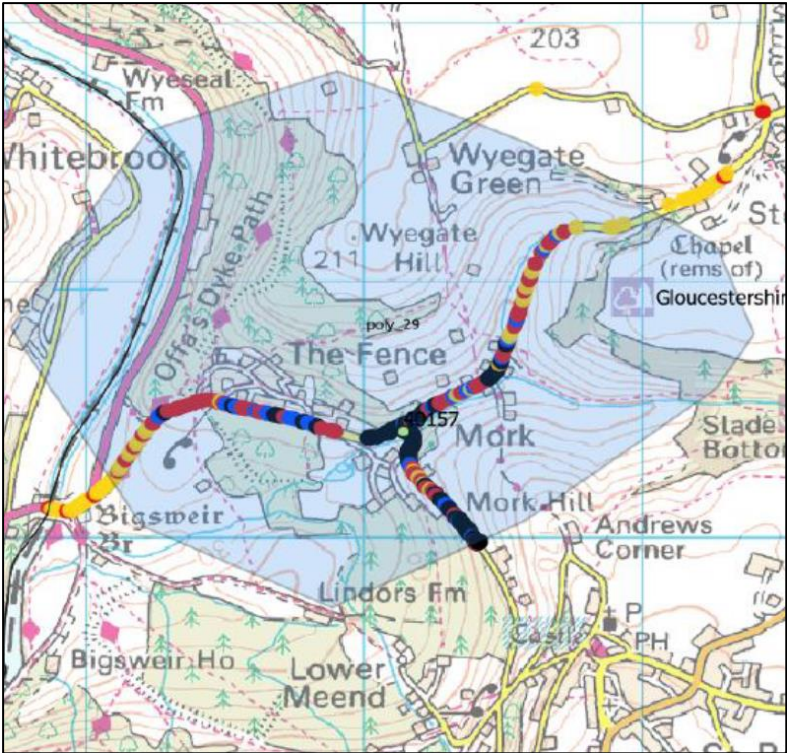
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1.0 Introduction

- 1.1 This Planning Statement is prepared on behalf of EE Ltd ('the Applicant') in support of an application, submitted to Forest of Dean Council, for the installation of a 15m telegraph pole communications mast, antennas and associated ground-based apparatus at land at Mork Clay Pigeon Shooting Club, Mork.
  
- 1.2 The application has been brought forward as part of the Home Office program for the renewal of the emergency services network (ESN) – moving from the current Airwave service (which cannot provide data services), to a 4G service provided by EE. A commercial 4G service will also be provided by the proposal benefitting local residents, business and visitors to the area.
  
- 1.3 The Home Office has strict criteria on the level of radio coverage to be provided and the resilience of such coverage, as you would expect. It is vital that the emergency services can access communications across the whole of the UK where they may be required to exercise their functions. The measure of the coverage is based on road coverage, that being all roads. Topography, such as that found in rural Gloucestershire, can mean providing this coverage can prove difficult. In this instance the coverage gaps on the road network can be seen below.



In the map above; green being good road coverage; black being no coverage; and red and purple represent poor coverage. The cell nominal i.e. the centre of the radio planners search is shown by the small purple circle annotated 40157. As can be seen, the coverage is very poor on this road specifically centrally with a lot of black appearing from the data.

- 1.4 Finding a suitable radio site is a complicated matter. Firstly, a target search area is identified based on the radio coverage shortfall<sup>1</sup>, then surveyors (after a desk-based survey) physically search this area looking for suitable sites. The main considerations, in no particular order of importance are; landownership; topography; availability of power and access; availability of backhaul<sup>2</sup>; any ecological considerations, heritage impacts; and planning designations.
- 1.5 With the majority of the ESN network completed, the ESN sites now being brought forward are for very specific target areas of road which have proven particularly difficult to provide coverage to. This restricts the initial search area even further both in terms of radio coverage to the road and the knock-on effects on backhaul. In this case these areas of road can be seen on the map above. The process is described on the Government's ESN web page<sup>3</sup>. It states:

***EE coverage***

*EE will provide ESN coverage along major and minor roads, selected buildings, road tunnels and railway facilities, as well as 12 miles out to sea and up to 500 feet above the ground. EE's delivery of ESN incorporates coverage improvements to their existing commercial 4G network via a programme of site upgrades.*

*ESN users will get priority use of the EE 4G network via a dedicated network code and utilise priority radio and core network bearers to access ESN public safety services.*

***Coverage assurance***

*This will give users the ability to assure signal coverage, so they can confirm EE are meeting their contractual obligations. It will provide a common approach for checking coverage required from other ESN projects, for example the extended area service and ESN in London Underground.*

*EE remain responsible for assuring the contracted coverage delivered in the 'primary area'. EE will do this by using various measuring techniques such as calibrated prediction modelling, crowd sourcing techniques and calibrated drive or walk testing.*

*ESMCP has procured a coverage testing capability with associated reporting and support services called 'ESN Assure', which, in cooperation with the emergency services, will provide a mobile platform for wide-area coverage testing.*

*ESN Assure was launched on 9 November 2018 and, together with the emergency services, ESMCP will undertake extensive coverage testing. This will give early sight of any issues and allow both early entry into the gap fix process and build user confidence in coverage availability and performance. Any results obtained will need to consider the maturity of the network delivery in that area*

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<sup>1</sup> The primary consideration as this is the function of the proposed development

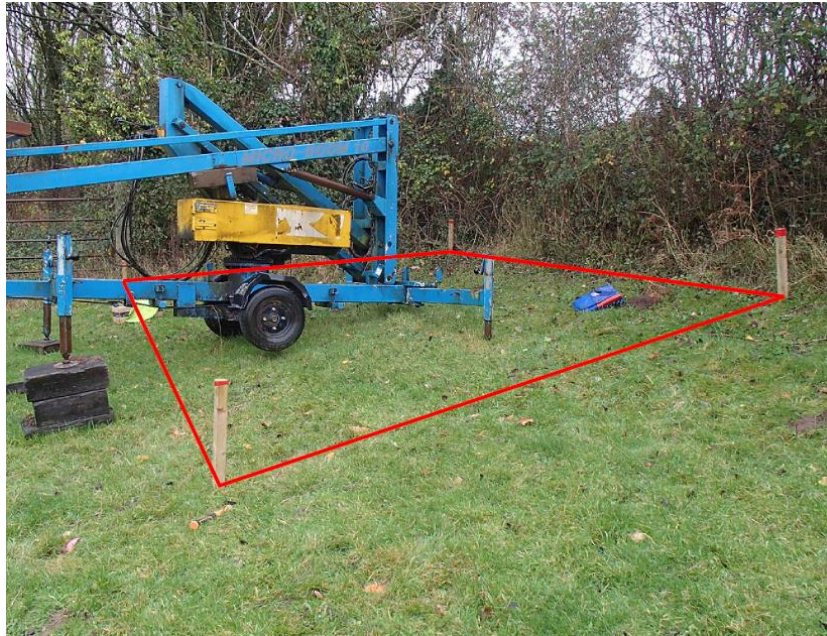
<sup>2</sup> The ability to get the radio signal from the cell back into the network, by fibre as first choice, then transmission link (line of sight required) and as a last resort the VSat solution (which is also a resilience feature)

<sup>3</sup> <https://www.gov.uk/government/publications/the-emergency-services-mobile-communications-programme/emergency-services-network>

- 1.6 Submitted alongside this application, and previously forwarded as part of the pre-application enquiry were two documents which give some more details about the ESN project. These being:
- Home Office Briefing Letter
  - Home Office Information Note
- 1.7 In this instance, the proposed communications mast is seeking to provide coverage around Mork – as identified in the above colour-coded coverage map.
- 1.8 It should be noted that this is a resubmission of a previous proposal (P1614/19/TE) which has now been moved to take into account the requirements of the landowner. That application was withdrawn before determination on 8<sup>th</sup> November 2019.

## 2.0 Site and Surroundings

- 2.1 The application site comprises a very small area of agricultural land on elevated land above Mork Clay Pigeon Shooting Club and is associated buildings. It has been specifically positioned close to a small grouping of tall mature trees.



*Fig 1: View of site – approx. location – see drawings*

- 2.2 The site will be accessed from the existing track leading from the south which can be seen on the attached drawings and photos.
- 2.3 The surrounding land is undulating, sometimes quite steeply with the road which requires coverage following the valley floor with the land rising steeply to the west and east and dropping to the south before rising towards St Briavels. This valley with its steep sides means getting coverage into it has not been possible from the existing planned sites around. This topography provides both the challenge for providing radio coverage and the siting opportunity with the elevated land within allowing good siting opportunities.
- 2.4 In terms of the site's setting, the rising land, the hedgerows at road level and the mature trees provide some setting and context for the proposed pole. As discussed above, the small tree grouping provides a good backdrop to the proposal and means it will not be viewed as an isolated feature on the roadside. It also provides some vertical context for the pole.



- 2.6 In Local Plan policy terms, the site falls within the Wye Valley AONB. This being highlighted in the pre-application response from the LPA.
- 2.7 In terms of siting and design, the site location chosen allows the use of a discrete telegraph pole design and as such impacts are minimised.

### 3.0 The Planning Application

3.1 This planning application is submitted as a 'prior approval' application. This is because the overall permission is already granted through the General Permitted Development Order (GPDO)<sup>4</sup>. In England the legislation was amended in 2016 to allow LPAs to be even more supportive of telecommunications development - which in turn will allow the faster and more efficient roll-out and upgrade of communications development. A consultation is now underway to relax these rights further to expedite 5G rollout. The key components of the application are as follows:

- Installation of a 15m telegraph pole communications mast
- 3 No antennas and 2 No transmission dishes
- Ground-based equipment cabinets
- Ancillary development

3.2 What should accompany a prior approval application is set out in legislation. However, EE is providing additional information which should help the LPA in their assessment of the application alongside this planning supporting statement. This includes:

- Drawings
  - Location Plan
  - Site Plan
  - Elevation
  - Photos and satellite information
- ICNIRP Certificate
- Coverage details
- Assessment of heritage impacts (within this supporting statement)
- Assessment of landscape impacts (within this supporting statement)
- Home Office Project Information
  - Home Office Briefing Letter
  - Home Office Information Note

3.3 Legislation requires that planning applications should be made in accordance with the development plan unless material considerations indicate otherwise. For applications made under the GPDO, planning permission is already granted through the general grant of permission with the determining issues for the LPA being the siting and appearance. In this respect, those policies which deal with these issues will be the most pertinent and carry the most weight. In this land designation, permitted development rights extend to 20m in height<sup>5</sup>. Part 16 of the GPDO gives an in-principle planning permission up to 20m subject to the prior approval of the LPA in regard to siting and appearance. The

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<sup>4</sup> The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2016

<sup>5</sup> The Town and Country (General Permitted Development) (England)(Amendment)(No.2) Order 2016 – this relates to the location within Article 2(3) land



distinction between a prior approval application and a planning application is important. The National Planning Practice Guidance notes:

*The statutory requirements relating to prior approval are much less prescriptive than those relating to planning applications. This is deliberate, as prior approval is a light-touch process which applies where the principle of the development has already been established. Where no specific procedure is provided in the General Permitted Development Order, local planning authorities have discretion as to what processes they put in place. It is important that a local planning authority does not impose unnecessarily onerous requirements on developers, and does not seek to replicate the planning application system.*

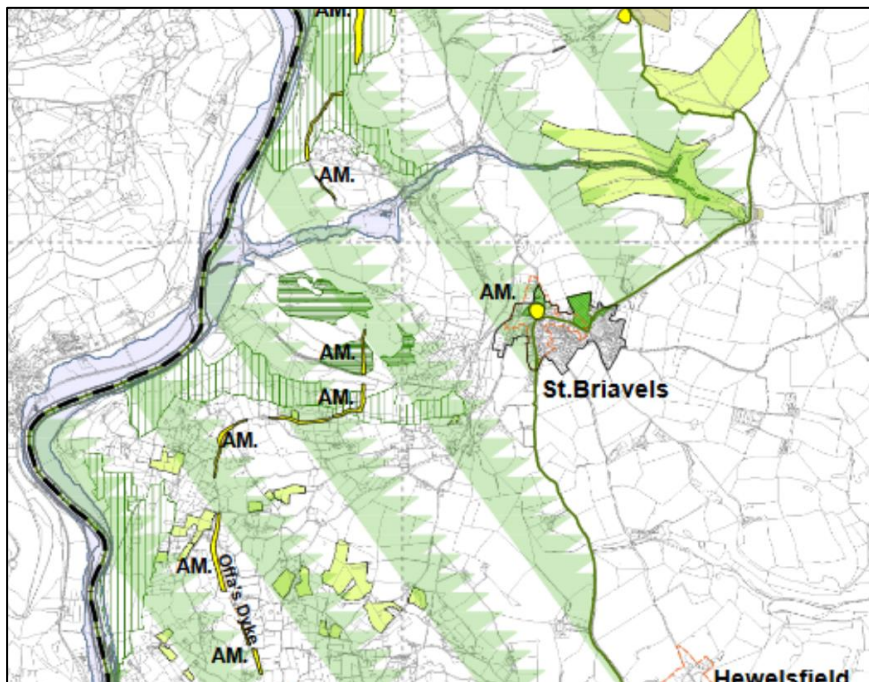
*Paragraph: 028 Reference ID: 13-028-20140306*

- 3.4 For this application, the location means that the main issue for the decision-maker will be the impact on the landscape and natural environment, when balanced against the need to provide coverage to the road network as part of the emergency services 4G communications network (ESN). Part of that balancing will also include the support from the Government for improved connectivity, especially for high data networks such as 4G and especially in rural areas.
- 3.5 The following analysis, we hope, demonstrates that the proposed solution represents the best balance between the often-competing factors of efficient radio coverage and protection of the landscape.

## 4.0 Planning Policy

### Development Plan

- 4.1 The provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended (GPDO), under Schedule 2, Part 16, Class A, Paragraph A.3(4) require the local planning authority to assess the proposed development solely on the basis of its siting and appearance, taking into account any representations received. As the principle of development is established by the GPDO, the provisions of Schedule 2, Part 16, Class A do not require regard be had to the development plan. Nonetheless, we have had regard to the policies of the development plan and any related guidance only in so far as they are a material consideration relevant to matters of siting and appearance.
- 4.2 The Forest of Dean Core Strategy was adopted in 2012 and is the extant development plan for this application.
- 4.3 The Plan does not have a telecommunications policy within it. Telecommunications development brings with it very specific locational requirements, operational height requirements and needs both access and a power supply. More general planning policies sometimes have difficulty in dealing with such very specific locational matters. The applicant did undertake pre-application discussions with the LPA (P1362/19/PREAPP) for the previous proposal, and a response was received highlighting the AONB location as being the most pertinent consideration.
- 4.4 The Local Plan map is reproduced below and as can be seen the AONB designations lies across the application site and the immediate surrounding area.



- 4.5 Due to the careful siting of the proposed mast within the landscape/AONB, its limited height, its slimline design, its location close to a tree grouping and its limited public views, the proposed mast complies with the most relevant policies from the development plan and is therefore unlikely to be in

conflict with any of them – as they relate to siting and appearance. In coming to this position, due regard should be had to the fact that no location outwith the AONB could be used due to the location of the road coverage required within it.

#### National Planning Policy Framework (NPPF)

4.6 The main national planning policy guidance in England is the NPPF. This a material consideration which carries great weight in any development control decisions affecting electronic communications networks. The importance of such networks is clear from the policy. Passages from the policy are set out below.

*112. 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.)*

*113. 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.*

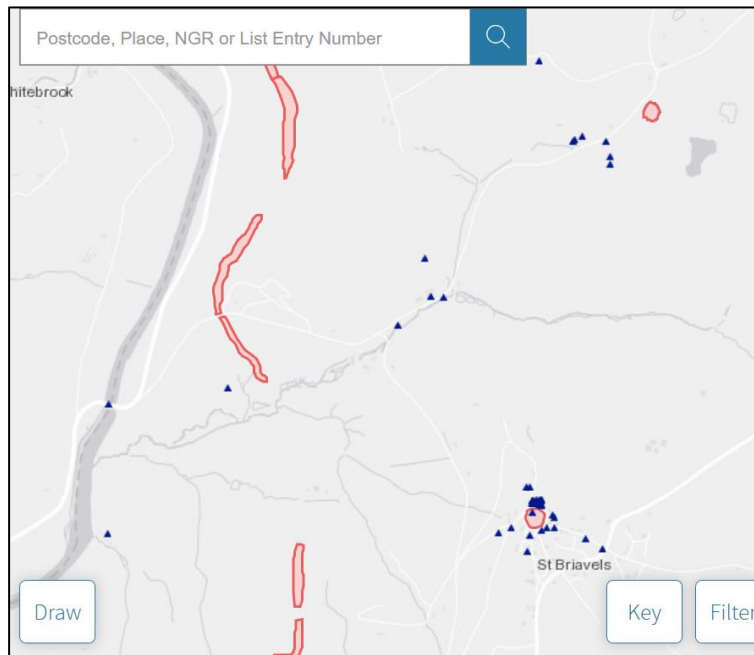
4.7 The above policy demonstrates the importance attached by the Government for telecommunications, especially in rural areas and it is considered it offers strong support for this application. In this case there was no opportunity to use an existing mast, building or other structure. On that basis a new site was required and the AONB could not be avoided. However, the design chosen, a simple telegraph pole style design and its elevated location with a group of mature trees as a backdrop means that it is both sympathetically design and camouflaged – this is considered appropriate in the AONB

4.11 Taking all of the above together it is considered that, as a material consideration and as it is relevant to siting and appearance, there is both development plan compliance and national policy support the proposed mast.

## 5.0 Other matters

### Heritage Impacts

- 5.1 The siting of the proposed apparatus has taken into account heritage impacts in the area. As can be seen from the mapping below (English Heritage), there are some Scheduled Monuments and a listed building in the wider area.



- 5.2 The main heritage assets shown above with the blue triangles representing listed buildings and the red shaded areas Scheduled Monuments. The Scheduled Monuments are all set at distances far enough away and/or across substantial wooded areas for there to be no impacts on the Monuments themselves or their settings. As can be seen there is only one listed building potentially affected by the proposal. This is set around 430m to the south on the shoulder of the hillside. This is:

- Grade II Listed Building – barn about 170metres north of Mork Farmhouse (approx. 300m east). The distance between the asset and the application is across two relatively large fields and is around 430m. There are very few views (and fewer public views) where these can be seen together. Below is one of the panoramic photos from the site looking south (@210°) which looks across the listed building. It is annotated below and the roof can be seen on the shoulder of the hillside as it rises from the valley floor. As can be seen, the scale of the development and the limited setting around the barn, including the adjacent non-listed building, mean that any impacts are negligible (less than substantial). This is helped by the tall mature trees which would backdrop the pole in views north from the barn – see panoramic photos below.



There would therefore be no impacts on the listed building or its setting from the proposed installation which would stop prior approval being granted. We have identified that there will be negligible, less than substantial impacts on one listed building. It is considered that the substantial public benefit provided by the 4G emergency services coverage and the 4G commercial coverage for residents, visitors and business in the area would outweigh any such impact.

Landscape Impacts

- 5.3 The application in front of the Council is a prior approval application where the principle of development is already established through the general grant of planning permission. In protected areas, such as an AONB, this general grant extends to 20m in height. The prior approval element for the Council, as LPA, to consider, extends to the siting and appearance of the proposal. Firstly, it should be noted that visual impact, and hence by definition, potential landscape impacts, are implicit in the legislation. This is why permitted development rights are less in Article 2(3) land than they are elsewhere.

Appearance

- 5.4 A replica telegraph pole has been proposed. Obviously, the pole is slightly taller and wider than a traditional wooden telegraph pole as it has a different function – however it does mimic its simple shape and colour (it is only 324mm wide). This design is at the lowest impact end of the spectrum of designs which mobile operators have at their disposal. It is thought to be the design choice which best minimises impacts and the best response for this landscape environment. It is considered that a standard monopole (with exposed antennas) or a lattice mast would have greater impacts. Whilst a 15m height is being proposed, this is 5m less than the permitted development rights allow for in protected areas (that being 20m) – this also demonstrates that impacts are being minimised through design.

Siting

- 5.5 The area which requires coverage can be seen on the map above (para 1.3). The requirement restricts the locations which can provide coverage to those very close to the roads and on elevated land to ensure that the radio signal ‘penetrates’ the valley floor and is not blocked by the large mature trees which line the valley both along the roads and the patches of mature woodland in the surrounding land. The AONB boundary lies around 1km east of Mork at Stowe and on that basis, and bearing in mind the topography, there are no siting opportunities outwith the AONB which could provide the required level of coverage to the roads.
- 5.6 It is noted that the previous pre-application feedback was not based on a site visit and the local topography can be assessed during the site visit for this application however the map below gives some indication. It is taken from the Government’s mapping tool<sup>6</sup> and the heritage and environmental designations can also be seen (minus the AONB which covers the whole mapped area). The closely drawn contours give some indication of the steepness of the hills rising to the north, the south and the east. These give some indication as to why the road may be difficult to provide radio coverage to and also the difficulty in find a suitable site.



- 5.7 The rising land on which the application site sits combined with the tall mature trees to the north, means that there will be few views where the pole will be seen against the skyline. This reduces visual impacts across the AONB. Its association with the grouping of tall mature trees helps with this as it reduces visual impacts by association, providing both a backdrop for the pole and ground based apparatus and a vertical context. It also means that in terms of the eye being drawn on medium and longer-range views, the pole will not be seen as an isolated feature on the roadside (see submitted photomontages). Access to the site will be taken along the existing track, again reducing impacts on the AONB. The existing access track leading north from access from the public road can be seen on the submitted drawings and panoramic photos below.

<sup>6</sup> <https://magic.defra.gov.uk/MagicMap.aspx>



As can be seen from the above, in views from 300° to 90° (i.e. 150°) there will be trees to a height of 15m, the same height as the proposed pole/mast. This provides a backdrop when viewed from the south and from the public road which can be seen on the photos. It also screens the pole in views from the north as can also be seen with no visibility of the road at all meaning that the pole will be entirely screened when travelling south. Also of note is that the trees are not in leaf and when they are the level of backdrop and screening will increase accordingly. What the panoramic photos show is that the pole will only have a landscape/visual impact on a few fields and, even then, this will be backdropped by the trees at 300° to 90° - this demonstrates that there will be very limited impacts over the AONB,

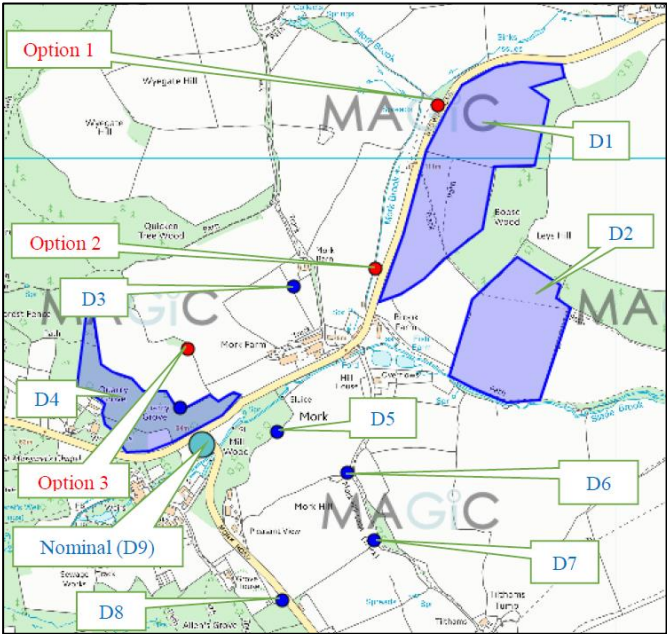
5.8 As described above, it is considered that the siting of the proposed pole minimises its impacts across the AONB, however other sites were considered by the applicant’s surveyors and these alongside comments are discussed below. The availability of alternatives has direct impacts on the siting chosen.

Alternative Options

- 5.9 The area where the coverage shortfall is experienced is shown above (para 1.3). The local topography limits the locations where any antennas can ‘see’ the uncovered roads around Mork – this limitation is added to by the often thick mature tree cover which can also inhibit radio coverage. In those areas that can ‘see’ the roads, there were no existing masts which could be shared or any suitable buildings or other structures on which apparatus could be located – these are the preferred options in the NPPF.
- 5.10 On this basis, a new ground-based mast was required and the proposed location, close to tall trees is considered to represent the best location for such mast (siting) and the telegraph pole the type of mast which best minimises impacts (appearance). See map and further details below.

The options considered can be seen above and are discussed below.

1. Option 1 – The application site
2. Option 2 - Located adjacent to Stowe Road with greater visual impact on road users and the AONB than the proposed option. In addition, does not perform as well as the chosen option for road coverage especially on the road rising south towards St Briavels (Mork Road) – discounted on that basis
3. Option 3 – the previous option which was progress to application (P1614/19/TE) then withdrawn to take account of landowner requirements



- D1 – Area below Boose Wood: Steep land with poor access and a long distance from power. Poor coverage across all the roads requiring coverage, especially Mork Road
- D2 – Brook Farm: Steep land and thought to provide insufficient coverage (especially to Mork Road), also proximity to SSSI



D3 – Mork Barn: Landowner strongly against hosting apparatus and any new mast would be close to the listed building or within its setting – discounted for those reasons

D4 – Quarry Grove Wood: SSSI and too low with very tall trees blocking coverage

D5 – Mill Wood: Very tall trees blocking coverage and would require very substantial tall lattice tower

D6 – Mork Hill: Site on public walk and a would have a greater impact on the properties to the north and the AONB.

D7 – Mork Hill 2: Site on public walk and would have a greater visual impact than the proposed site

D8 – Allen’s Grove: Too low lying and would have a greater impact on residential amenity than the proposed location.

D9 – Village Centre (Nominal): No available land suitable for telecommunications apparatus and too low lying to provide required level of coverage.

5.11 Taking the siting and design together it is considered that the proposal is the one which best minimises impacts on the AONB and it is hoped that the Council can support this application.

## 6.0 Conclusions

- 6.1 This planning statement is submitted in support of the application for the installation of a 15m telegraph-pole mast, antennas, ground-based cabinets and ancillary development. The development will support the new 4G ESN network which will be used by the emergency services. Commercial 4G coverage will also be provided by the installation to the benefit of local resident business and visitors.
- 6.2 The location chosen for the mast is set far from the majority of public views and the topography will limit any visual impacts from the mast across the AONB landscape. There were no existing masts in the area of search. There were no buildings or structures which could provide a more suitable alternative in terms of siting or design.
- 6.3 Whilst there are some heritage assets in the vicinity they are located at a distance and orientation (including topography) that mean there will be no impacts on these assets.
- 6.4 The use of the replica telegraph pole, an existing access track, the rising hillside and the group of tall mature trees all combine to show that the siting and design is that which best minimises its impacts across the AONB.
- 6.5 Taking all matters together, balancing any impacts of the proposed installation versus the benefits of the coverage and the limitations of the small search area, as well as the technical requirements of mobile connectivity, then it is considered that the prior approval for siting and appearance for the proposal should not be required, however if it is so, then it should be granted.