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To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : DET/2022/0021 Site Address: PROPOSED TELECOMMUNICATIONS
INSTALLATION Old Hall Square Hadfield Glossop Derbyshire Comments by: Shirley van der Maarel

From:

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Submission: Objection

Comments: Dear Planning Committee,

I would like to object to the planning application as the proposed mast is out of scale and out of character with the conservation site it will be placed on. It will dominate the square and detrimentally and irrevocably impact its historical and cultural environment. The Council has a duty to protect the site from such developments. Below I outline my arguments in detail.

---(1)--- The square is in a conservation area which the council has a statutory duty to protect. As the committee is aware, the square lies in a conservation area, the only heritage site in Hadfield, with some of the buildings going back hundreds of years. There are old farms, cotton weaver's cottages and the Old Hall was built by sir Hadfield himself. The tower's material, size and overall design sits uncomfortably with the historic architecture, which has a clear detrimental effect on the character and appearance of the area, as well as the setting of the three listed buildings that surround the square. The council has a statutory duty to protect conservation areas (Act 1990, Section 66). This duty is not limited to specific buildings. Heritage assets could also be a place, area or landscape (DP, p.82). In fact, all the features, listed or otherwise, within the area, are recognised as part of its character. Conservation area designation is the means of recognising the importance of all these factors and of ensuring that planning decisions address the quality of the landscape in its broadest sense. (HE). The council therefore has a duty to protect the whole square, including all the elements that make up the overall character. It is to uphold this duty not only for the sake of current residents (some of whom might even support the proposal), but on behalf of and for the enjoyment of all existing and future generations, as this is an irreplaceable resource (NPPF, p.55). The Council recognises that heritage assets are irreplaceable resources and - through conservation measures - will manage change to assets, in ways that sustain and where appropriate, enhance their significance. (DP, p.82). The modern mast, that is out of scale and out of character, does not sustain, and definitely does not enhance the heritage area.

---(2)--- It is not just a statutory duty, the council is itself deeply committed to preserving the historic environment and identity of the Glossopdale area, as clearly set out in its local development plan (Source reference: DP). The plan identifies key issues for the coming years, of which two (KI1 and KI9) are directly referencing the protection of the historic character and open spaces. These key issues are summarised in three overarching themes (one of which is the protection of the area's distinctive character), into strategic objectives (SO2, SO3 and SO4 directly mention preservation of character), and finally into policies (where policy S1, S5, EQ2, EQ6 and EQ7 are again directly concerned with the council's commitment to protect the historic environment). In the 235 page document, there is only 1 single mention of telecommunications, but even there, in the same sentence, the council states it will only support improvements to telecommunications that does not have an inappropriate impact on the landscape or townscape (DP, p.133). The proposed tower clearly does have an inappropriate impact on the landscape (see also point 4).

---(3)--- It is not just a conservation area on paper, it is also valued and enjoyed as such by people locally, regionally and nationally. There are endless comments on facebook pages (e.g. Hadfield & Padfield - Then & Now or the Glossop Heritage Trust) that are evidence of this. The square is part of the Hadfield and Padfield heritage trail, it was featured in the Great British Life (magazine and website) and it is promoted by the Glossop Heritage Trust and the Glossopdale & Longdendale Archaeological Society with members from across the High Peak. As well as the explicit ways in which people communicate their appreciation, it is visible in the way people use the space. My husband and I live in one of the cottages bordering the square and we can see how people are enjoying the square's view on the bench, and how the square has become a meeting point for people of all ages, dog walkers and students who walk to school together. None of this is directly hampered by an internet tower, but the character of the square is, which will likely change its use and enjoyment, which are surely key factors in what is considered the quality of the landscape and people's lives.

---(4)--- The applicant's proposal is not formulated with heritage in mind, as is required by the Government (Source: CC) and requested in the NPPF: 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance' (NPPF para. 194). Yet, in none of the applicant's submitted documents there is any mention of the tower's site being located in a conservation area and none of the listed buildings are mentioned or taken into consideration. The applicant only states how it believes the mast is supposed to integrate with the built surrounding.

-(A)- 'It is set against the backdrop of mature trees that greatly help to camouflage the mast, and the height of the pole kept down to a minimum' (SSSI p.3). Even so, it is still sticking out more than 5 metres above the trees, and (listed) stone buildings, and will thus dominate the skyline.

-(B)- The proposed design is meant to integrate with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns in this area' (SSSI, p.7). It is true that there are a number of street lights, that are also shaped as a column and stand up vertically, but that is where the similarity ends. The lamp posts are made of a different material, have a different colour, they taper inwards, do not stick out above the buildings or the trees, are nearly half the size of the tower and do not require a line of 2m high cabinets at their base.

-(C)- The applicant recognises that there will be an intensification in the amount of equipment (an additional monopole and associated cabinets in the area) it is felt that such a minor increase would not detract from the character in which the proposal sits. It is not clear to me how the applicant concludes or feels that this a minor increase. The square goes from no equipment to having a 5m long line of cabinets that are taller than any passer-by, and a tower that sticks out at least 50% above the current tree and building line. To get a sense of what the visual impact would be I have photoshopped the tower and cabinets in place, as much as possible in line with the dimensions provided. See the four photos uploaded to Dropbox: <https://www.dropbox.com/sh/0riicfm5i5z4dl9/AABJjCYKt5NKgcfuF9UJvJsa?dl=0> The applicant may have put some effort in minimising the impact, but this does not mean that the impact itself is minor.

---(5)--- The harm to the heritage site is neither justified by the applicant, nor is it justifiable as it is not outweighed by public benefits, and therefore it does not accord with the NPPF or the Council's development plan. Following on from the previous points, it is clear that the arrival of the tower would lead to harm to the conservation site. The NPPF dedicates two whole chapters on conserving the natural and historic environment (Ch. 15 and 16). The applicant has completely ignored these chapters, and only references, in isolation, chapter 10, and paragraph 118 in specific. In doing so it creates the mistaken understanding that the NPPF requires authorities to support telecoms, not to question the need for the service, and not constrain Operators (SSSI, p.8,9,12). But nothing is less true. Paragraph 118 states that LPAs should determine applications on planning grounds only, and what those planning grounds are is set out in Chapter 16. Here it states that great weight should be given to conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. (NPPF para. 199, p.57). The policy continues stating that any harm needs clear and convincing justification (para. 200), in the case of substantial harm it should be

refused consent (para. 201), and in the case of less than substantial harm it should be weighed against public benefits of the proposal (para. 202). Contrary to what the proposal claims, LPAs can and should question the need for the installation as long as they do so on planning grounds. The harm has been clearly set out in the previous points, so this begs the question; what are the benefits? The applicant makes a weak case for the public benefits.

-(A)- the application quotes a previous appeal where it merely states that there would be clear economic and social benefits, without a case for what those benefits are (SSSI, p.6, and Appeal reference: APP/G4240/W/20/3263529). More importantly, the site in that appeal is not a conservation area, and so the weight of the supposed benefits did not need to be taken into account and therefore the quote from the appeal carries no real significance for the proposal under consideration.

-(B)-The applicant clearly states that CK Hutchison has a need to expand and promote telecommunications networks across the region (SSSI, p.12), but not how that translates into public benefits. It should be remembered that improved internet speeds is not itself a justification for the harm that is being done to the conservation area. Public benefits are defined as anything that delivers economic, social or environmental objectives (PPG), the objectives are further outlined in NPPF, para.8. To judge how the proposed installation is achieving any of these benefits, we would need ask questions like what is exactly the coverage area and how many people will be covered by the tower? What will be the increased internet speeds and how are increased speeds translating into a material impact on people's lives, the local economy or strong communities? The applicant makes no effort in outlining any of the technical aspects which would help answer some of these questions. The only technical explanation the applicant gives for the installation is that the cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m meaning that it would not be feasible to site the column outside of this locale. It does not further explain what a cell search area actually is. Is it the area in which a mast needs to be located to provide the desired coverage? If so, then why are all the discounted options (SSSI page 9) all outside of this particular locale. Or should it be understood as follows: the coverage area in which service is provided is divided into a mosaic of small geographical areas called "cells" (Wikipedia). In which case a typical cell radius of approximately 50m would provide coverage only in the square itself, and to the 10 houses around it. Given that judging the public benefit is fundamental to this application, I think it is warranted to ask for a clearer and more detailed explanation of the technical justification for the tower. In addition, I would like to state that I, as well as everyone else who is objecting, are part of the public and for us it clearly does not outweigh expected benefits.

-(C)- Even if the tower improves capacity and coverage in relation to the other CK Hutchison Networks, it is not clear if this will actually improve internet speeds in relation to people's own current internet. The Government have defined a decent connection as one that can deliver 10 Mbps download speed (Source: USO). 99.68% of premises in the SK13 area have >10Mbps broadband at home (CN Data). Admittedly, 5G would be faster than that, average between 90-230Mbps (Source: 5g.org.uk), but 88.59% of premises are already enjoying 30-300 Mbps speeds (CN Data). The only premises that would significantly benefit from 5G are the ones that fall below this 10Mbps threshold, but those postcodes (SK13 6ED, SK13 1HZ, SK13 1JD, SK13 6JZ, SK13 7PN) are more than 5,000 metres away and therefore in any case out of reach of the 5G tower (CN Data). It should also be taken into consideration that 5G is not the only improved connection that is being planned.

Ofcom, the regulator for the UK's communications services recently published a report where it argues that by 2025, 84% of all properties will have full fibre availability, and Gigabit-capable coverage (1,000 Mbps) could be in excess of 90% (CN Report, p.1). Both of these connections do not require additional masts. This is not to say that there is no value in 5G, it is merely to inform the way the public benefit is weighed against the harm that is being done to the square. From personal experience I can say that my husband and I work from home in web development and media, are extensively working with heavy files on the internet and do not face any mobile or internet constraints. I understand that this is anecdotal evidence, but given the harm that the tower imposes on the square I think it is necessary to question the assumed public benefit of higher internet speeds.

-(D)- a returning argument the applicant gives is that the Council's development plan should be followed (DP, p. 5, 6, 10 and 11), apparently assuming that 5G masts by definition constitute development. On the contrary, the development plan that the applicant refers to extensively mentions the vital need to protect the area's heritage, and makes practically no mention for the need to improve telecommunications (also see point 2). Given that >99% of premises have a decent internet connection, I don't believe this omission is accidental, but is rather an expression of a lower priority, as the area experiences many other key issues and pressing needs that have a much higher impact on economic, social and environmental concerns, one of which is heritage conservation.

---To conclude---

I have put a lot of effort in this objection, for no other reason than that I really care about the preservation of the heritage site. We have moved to Hadfield, specifically because of the appeal of this square. All other people who have objected, with perhaps less words or less time to commit to research, equally show they care about the square's conservation. The proposed mast will detrimentally and irrevocably impact the historical and cultural environment of the square, with three listed buildings on it. Heritage is the primary consideration, not just one factor among others (CC). I thank the committee for taking this objection seriously and sincerely hope it has convincingly demonstrated that this application in no possible way meets the requirements for approval.

-----Sources and abbreviations-----

LPA = Local Planning Authority ---

DP = The High Peak Local Plan Adopted 2016, which the applicant refers to as The development plan (SSSI p.5). www.highpeak.gov.uk/article/650/Local-Plan-consultation-and-examination ---

HE = Historic England's Heritage Protection Guide on conservation areas.
www.historicengland.org.uk/advice/hpg/has/conservation-areas ---

Act 1990 = Planning (Listed Buildings and Conservation Areas) Act 1990.
www.legislation.gov.uk/ukpga/1990/9/contents ---

CC = Constituency Casework, 2022. Planning permission in Conservation Areas and listed buildings in England, in House of Commons Library. www.commonshlibrary.parliament.uk/planning-permission-in-conservation-areas-and-listed-buildings-in-england ---

Wikipedia = Cell Site, en.wikipedia.org/wiki/Cell_site ---

USO = The Universal Service Obligation (USO) for Broadband, from the House of Commons Library
www.commonshlibrary.parliament.uk/research-briefings/cbp-8146 ---

PPG = Planning Practice Guidance, in this case the guidance on Historic environment.
www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment ---

CN Data = Ofcom's Connected Nations 2022: data downloads. www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-2022/data ---

CN Report = Connected Nations Supplementary report on Planned Network Deployments 2022, from Ofcom.
www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-planned-network-deployment ---

SSSI = Site Specific Supplementary Information, provided by the applicant from
www.planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=258852

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