



NPA/DM/25/006

Dartmoor National Park Authority
Development Management Committee

4 April 2025

Applications to be Determined by the Committee

Report of the Director of Spatial Planning

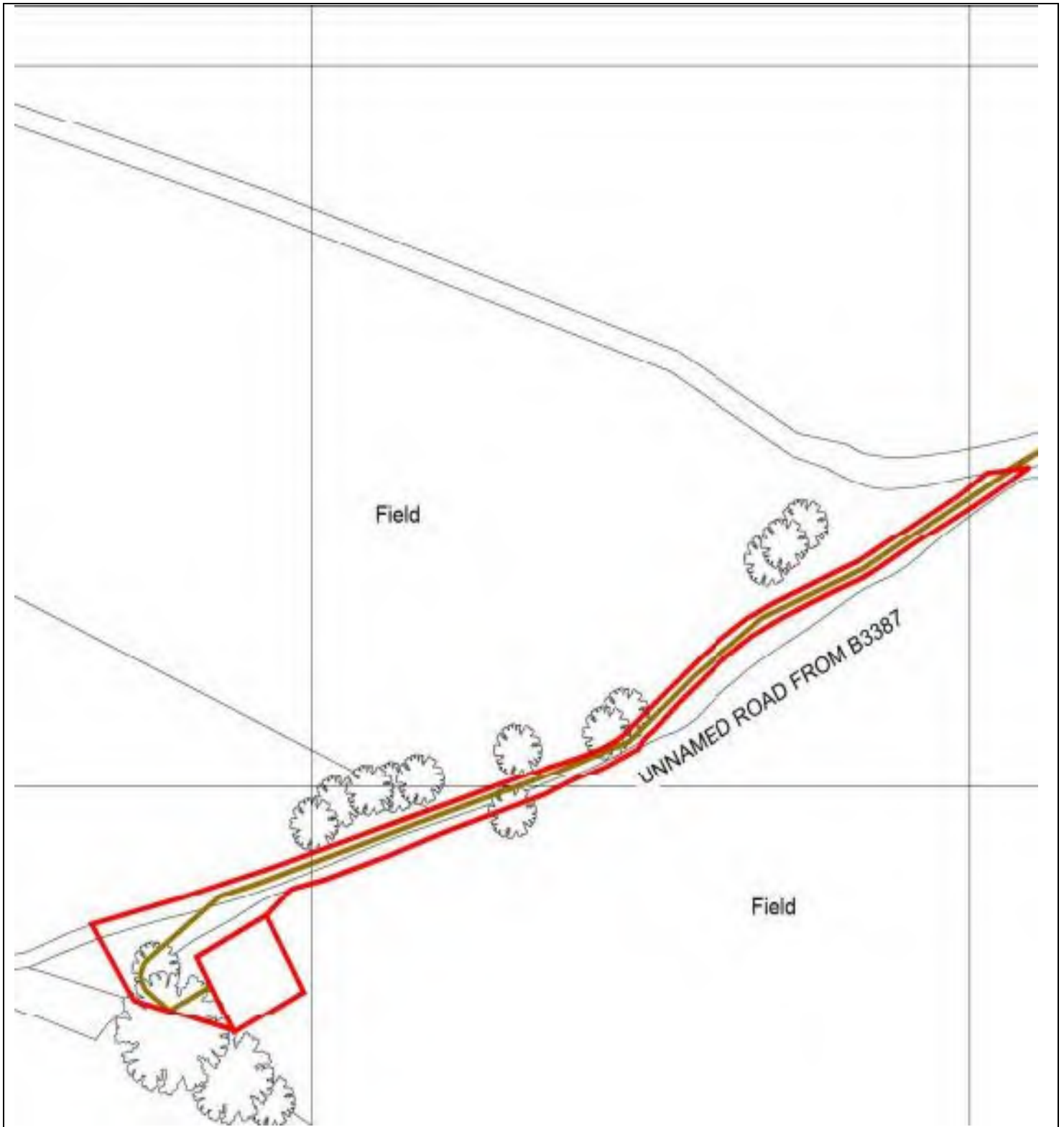
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0210/24

Challamoor Field, Buckland in the Moor, TQ13 7TG



Item 1

Application No: **0210/24** District/Borough: **Teignbridge**
Application Type: **Full Planning Permission** Parish: **Buckland-in-the-Moor**
Grid ref: Officer: **Oliver Dorrell**

Proposal: **Installation of 20m lattice telecommunications tower supporting 9 no. antennas, 2 no 600mm dishes, together with 1no. foul weather enclosure, 1 no. generator and 1no. meter cabinet plus a 1.2m satellite dish and compound fencing for the EAS and Shared Rural Network projects**

Location: **Challamoore Field, Buckland In The Moor, Newton Abbot, TQ13 7TG**

Applicant: **BT/EE**

Recommendation: **That permission be APPROVED, subject to the following conditions:**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
2. Unless otherwise agreed in writing by the Local Planning Authority, the development hereby approved, shall be carried out strictly in accordance with the following approved drawings: Amended Site Location Plan – numbered 002A-Issue-E6 received 18-11-2024, Amended Proposed Site Plan – numbered 150-Proposed-Site-Plan-E6 received 10-12-2024, Amended Proposed Elevation South – numbered 252-Issue-E6 received 18-11-2024, Amended Proposed Elevation East – numbered 251-Issue-E6 received 18-11-2024, Proposed Elevation North – numbered 250-Issue-E6 received 18-11-2024, Amended Proposed Elevation West – numbered 253-Issue-E6 received 18-11-2024 and Amended Arboricultural Layout plan – numbered arb-plan-nov-24 received 05-12-2024.
3. No part of the development hereby approved shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall set out, as a minimum, site specific measures to control and monitor impact arising in relation to construction traffic, noise and vibration, dust and air pollutants, land contamination, ecology and ground water. Thereafter, the development shall be carried out in full accordance with the approved CEMP at all times.
4. The mast and equipment attached to the mast hereby approved shall, unless otherwise agreed in writing by the Local Planning Authority, be painted Olive Drab RAL6022 in colour not later than 30 days after the substantial completion of the development.
5. Prior to substantial completion of the development hereby permitted, details of the proposed landscaping and planting scheme shall be submitted to the Local Planning Authority for approval. The landscaping and planting shall include a suitable replacement for the oak tree (T1) and shall be carried out in accordance with the approved scheme within twelve months of the commencement of the development,

or such longer period as the Local Planning Authority shall specify in writing. The landscaping and planting shall be maintained for a period of five years from the date of the commencement of the development, such maintenance shall include the replacement of any trees or shrubs that die or are removed.

6. No vegetation clearance or demolition works shall take place during the bird nesting season (01 March to 31 August, inclusive) unless a suitably qualified ecologist has confirmed in writing to the Local Planning Authority that the works will not disturb nesting birds.
7. The development and ecological enhancements hereby approved shall be implemented in accordance with the recommendations and requirements stated in the Ecological Assessment (Feb 2024, The Ecology Practice). This planning condition shall only be discharged when a suitably qualified ecologist confirms in writing to the Local Planning Authority that the recommendations and requirements have been implemented.
8. The telecommunications mast and equipment shall be permanently removed upon redundancy and the land reinstated to its former condition within a period of six months unless otherwise agreed in writing by the Local Planning Authority.
9. No external lighting shall be installed until a detailed lighting scheme has been submitted to and approved in writing by the Local Planning Authority. Thereafter, all lighting on the site shall accord with the approved scheme and other than those expressly approved by this grant of planning permission, no external lighting shall be installed at the application site.
10. Notwithstanding the details shown on the approved Amended Arboricultural Layout plan, precise details of the construction of proposed gravel access path from the gateway to the compound shall be submitted to and approved in writing by the Local Planning Authority prior to the works being carried out. Thereafter, only the approved method of construction shall be used.
11. Prior to the commencement of development on site, details of a method of below ground investigation to confirm the necessary root protection area for the group of trees growing on the bank (G1) to the south-west of the site, as shown on the approved Amended Arboricultural Layout plan, shall be submitted to and approved in writing by the Local Planning Authority. The below ground investigation shall be carried out in accordance with the approved details, and the findings of this investigation, together with confirmation of proposed root protection area, shall be submitted to the Local Planning Authority for approval. Thereafter, no excavations or below ground works shall take place in the approved root protection area.
12. Notwithstanding the approved drawings, details of the position of any soakaways shall be submitted to and approved in writing by the Local Planning Authority. The soakaways and surface water drainage shall be carried out in accordance with the approved details.
13. Prior to its installation, details of the proposed route and method of providing a power supply to the site shall be submitted to and approved in writing by the Local Planning Authority. The power supply shall be installed in accordance with the approved details.

1 Introduction

- 1.1 This application proposes a 20m slimline lattice telecommunications tower supporting 9 no. antennas and 2 no 600mm dishes – colour Olive Drab RAL6022. The tower would be 2m by 2m at the base, tapering to 1.5m by 1.5m at the top.
- 1.2 The tower would be located within a 12m x 12m compound formed of 1.8m high post and rail with deer netting fence.
- 1.3 Also located within the compound would be located 1no. foul weather enclosure, 1 no. generator and 1no. meter cabinet together with ancillary development thereto including 1.2m satellite dish.
- 1.4 The application is submitted on behalf of EE / BT as part of the EAS (Extended Area Service) and SRN (Shared Rural Network) projects. It will provide a radio base station which will be utilised by all four of the main telecommunications operators to provide high quality 4G service provision to this rural area of Dartmoor.
- 1.5 This application follows pre-application extensive engagement with planning officers in Autumn 2023.

2 Site and Surroundings

- 2.1 The application site is located in a field between Higher Pudsham and Challamoor. The village of Buckland in the Moor is approximately 1.2km to the south; Widecombe in the Moor is approximately 2.4km to the north.
- 2.2 The field comprises improved agricultural pasture. There is a hedgebank to the north-east of the site with a farm gateway in the corner and a small copse of several mature deciduous trees to the north and west sides of the proposed compound.
- 2.3 The site is adjacent to a farm track which, although is not a designated public right of way, has permitted public access.
- 2.4 The nearest building group at Higher Pudsham is approximately 200m to the west.
- 2.5 The site and surrounding land falls within Landscape Character Type 2D: Moorland Edge Slopes.

3 Consultations

- 3.1 Teignbridge District Council – No comments received at the time of report
- 3.2 County EEC Directorate - No highways objection
- 3.3 Environment Agency - Standing advice – Flood Zone 1
- 3.4 Historic England

On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

3.5 DNP Ecology & Wildlife

- 3.5.1 The habitats onsite are of limited quality ecologically, and the development is located a sufficient distance enough away from sites of national and international designation (SAC/SSSI) to have a material impact.
- 3.5.2 There is a small amount of hedgerow loss which may have some limited impacts upon bats, badgers, nesting birds and dormice; however, these can be mitigated through the conditioning a Construction Environmental Management Plan for approval prior to construction.

3.6 DNP Trees

- 3.6.1 The loss of one C category tree, T1 oak is acceptable subject to suitable replanting; this could be required by condition.
- 3.6.2 The existing gateway next to T2 will give access onto a proposed gravel area, presumably for vehicle access. No details of the new surfacing have been provided and this will likely cause damage to the trees root systems by compaction and severance depending on construction, a non-dig surface within the RPAs should be considered to protect the tree roots
- 3.6.3 While the trees are growing in a hedge bank the adjustment of the RPAs for G1 is questionable without evidence the roots are not growing in the soil of the field to the north, e.g., trial pits or trenches to check for root depth, density and distribution within the RPAs. This may result in significant root disturbance during site works.
- 3.6.4 Structure located within the RPA of T2 labelled 'Proposed 2No. Rainsmart Ellipse Doubletank module' needs to be explained.

3.7 DNP Archaeology

- 3.7.1 No heritage assets will be directly impacted by the proposed development. As indicated in the original comments from Historic England the proposed development would have a minor negative impact on the setting of Scheduled prehistoric settlements and fields to the east and north-east of the site (NHLE Nos: 1004589 and 1003283).
- 3.7.2 However, the proposed development is also situated in a landscape rich in non-designated heritage assets and its impact on these is presented in an excellent addendum to the heritage assessment accompanying the original application in accordance with paragraph 216 of the NPPF. These assets vary considerably in their significance but of particular interest are the various hut circles and enclosures dating to the Bronze Age. These form part of extensive prehistoric landscapes the rarity, extensive preservation and group value of which grants them considerable significance, arguably at a national or even international level despite their largely non-designated status. This is emphasized by the designation of some individual component elements such as the two monuments mentioned above. In its assessment of the impact of the proposed development on these heritage assets, the amended heritage statement displays a fundamental lack of understanding of their significance in the assertion that "Their location would have been in a prehistoric landscape that is no longer readily assessable" (Appendix 1, pg16). In

fact, it is precisely because these assets together comprise readily legible and assessable Bronze Age landscapes that grants them their significance. The result of this is a downplaying of the impact of the proposed development. Although, this is not substantial and the ability to comprehend the individual features and landscape is not diminished, the proposed development represents the imposition of a new, modern, vertical element which detracts from the ability to appreciate them, especially at a landscape scale. It is also worth mentioning in this regard that the fieldscape, settlement pattern and routeways in the area around the site of the proposed development consists of a coherent and extensive medieval landscape which would be similarly impacted.

3.7.3 In summary, although the impact of the proposed development on each visible heritage asset is individually minor, cumulatively it represents an intrusion which neither conserves nor enhances the historic environment and thus does not accord with National Park purposes.

3.7.4 Based on the above comments, refusal is recommended for the proposed development.

3.8 DNP Building Conservation Officer

3.8.1 A Heritage Addendum has been received (confusingly entitled Killarney Manor Cottages.). It contains information with respect to heritage matters I and others have raised. With respect to my matters, raised 12 June 2024 the report now discusses additionally non-designated heritage assets, buildings, structures and archaeological features.

3.8.2 I remain concerned, but my objection is removed.

3.8.3 The matter will now come down to the weighing and balancing processes of the decision-making system under Strategic Policy 2.7 of the Dartmoor Local Plan and Section 16 of the NPPF in relation to the harm on the significance caused by the proposal, the great weight which is attached to the conservation of all heritage assets, and the public benefits of the scheme.

3.9 Widecombe Parish Council (Neighbouring Parish) – Support - Whilst acknowledging that a mast is not aesthetically pleasing, a mobile signal is much needed in the parish of Widecombe. Representations from parishioners have previously been made to the Parish Council regarding the need for a mobile phone signal and this mast would provide this much-needed facility.

4 **Parish Council Comments**

4.1 Buckland in the Moor Parish Meeting – 19 June 2024

4.1.1 The application was discussed at a Parish Meeting on Wednesday 12 June 2024 attended by 15 parishioners, including myself and the Secretary to the meeting. We were fortunate to have representatives of EE, KTL and Perry Williams at the meeting, so we were able to ask detailed questions about the proposed tower.

4.1.2 One attendee voted in favour of the mast and 12 voted against it - the Secretary and I both abstained. Please note that the Parish Meeting was not against improved coverage for the Emergency Services or the Shared Rural Network (SRN) per se. However, we are very much against the choice of site for the tower and think that it would have been much better to have consulted the Buckland in the Moor community before choosing a site.

4.1.3 Our objections are as follows.

Need for a new tower

4.1.4 There is an existing Airwave mast east of Widecombe in the Moor (national grid reference E271256 N076856, option D1 considered by KTL). Our understanding is that a tower could use this site to provide coverage instead of the proposed tower in Buckland in the Moor, and that this tower would only need to be 20 m tall, not 30 m as set out in the planning application. Furthermore, our understanding is that once a new tower is in place, the existing mast at Glebe Farm will be redundant.

4.1.5 We think that a replacement mast at Glebe Farm would be permitted development under Schedule 2 part 16 of The Town and County Planning (General Permitted Development) (England) Order 2015. So there should be no significant planning reasons to prevent EE erecting a replacement mast on site.

4.1.6 One of the objectives of the SRN is to avoid a proliferation of masts. Policies 1.2 1 d) and 4.7 of the Local Plan 2018 - 2036 also try to achieve this. A new mast where an existing site could be used instead seems to us to be counter to both the SRN objectives and the Local Plan.

Lack of benefit to Buckland in the Moor residents from the proposed tower

4.1.7 We have been told that the proposed tower will not provide significantly improved coverage in Buckland in the Moor. We understand that existing coverage in the parish is provided by EAS0545 in Holne, and that upgrades are planned to this. We understand that most of any improvement in our mobile phone signal will come from these upgrades and not the new tower.

Lack of consultation on site

4.1.8 There has been no consultation with Buckland in the Moor in the selection of the actual site for 0120/24. Instead, the site has been presented as a fait accompli as far as we are concerned.

4.1.9 The code of practice for wireless development in England para 76 says that “Pre-application discussions are important in helping to identify the most appropriate solution for any proposed individual development. Consultation is important for ensuring the appropriate design and **siting** for wireless infrastructure and should take place as part of the pre-application process, where appropriate” (my emphasis)

4.1.10 Para 84 of the same code says “For some applications, it may be appropriate for the operator to consult with local residents. For example, a greater level of community consultation may be considered *for a new site or where there is a high-*

level of community interest in development, though the type of engagement should be considered on a case-by-case basis” (again my emphasis).

- 4.1.11 It seems obvious that a new tower in Dartmoor National Park will be of considerable interest to any affected community. We choose to live in the National Park because of its character and landscape, which are inevitably affected by any new infrastructure.
- 4.1.12 Buckland in the Moor residents who own land adjacent to any proposed site needed to be consulted during the site selection process. Not only are their views important, they could also have provided input into what sites are likely to be acceptable to the local community.

Impact on landscape

- 4.1.13 We think that there has been insufficient attention to the impact of the proposed tower on the landscape. We appreciate that work has gone into deciding from where the tower would be visible and that some screening is possible.
- 4.1.14 However, the Photomontage Report shows that the mast will be visible from a number of viewpoints, both close by and at a distance. The mast will be an obtrusive vertical structure obviously at odds to the landscape and its character. We think that its impact on the landscape does not meet the requirements of Local Plan policies 1.1 1 a), 2.1, or 4.7.
- 4.1.15 There will be an impact on the landscape wherever the mast is sited. But at least if an existing site is used, no new damage is done to Dartmoor.
- 4.1.16 We note that Widecombe in the Moor Parish Council also considers that the mast is not aesthetically pleasing.

Summary

- 4.1.17 This application seems to us to be unnecessary and at odds with the Dartmoor Local Plan 2018 - 2036, given there is an alternative site already in use which could be enhanced under permitted development.
- 4.1.18 Furthermore, the proposed site seems to be of little benefit but significant harm to Buckland in the Moor and we don't really understand why, if Widecombe needs this coverage, the existing site in Widecombe cannot be used.
- 4.1.19 Finally, we think that it would have been better to talk to Buckland in the Moor residents, and particularly local landowners, about choice of site before applying for planning permission
- 4.1.20 Please let me know if you have any questions about this letter.
- 4.1.21 We do also have one last request. Please could the name of the site be changed from Challamoore Field as residents particularly object to the name being the same as nearby properties. We would also point out that the post codes for the site and that for Challamoore are different with the possibility of confusion as a result.

4.2 Buckland in the Moor Parish Meeting – 26 October 2024

4.2.1 Thank you for your letter of 16 October regarding amendments to application 0210/24 for planning permission for a Telecomms Mast at Challamoor Field, TQ13 7TG.

4.2.2 We have not had a Parish Meeting to discuss the amendments, but we did have one in June this year to discuss the planning application. You will recall that I wrote to you on 19 June 2024 as a result of the meeting.

4.2.3 In that letter I explained that the Parish Meeting considers that the case for a mast at Challamoor Field has not been made, and that the case against using the existing Airwave site at Glebe Farm is insufficient to rule it out. Just to be clear, as you know under the Local Government Act 1972 (Part II sch 12 s13(4)), as Chair of the Parish Meeting, I am able to act its behalf in any way which does not conflict with a direction of the Parish Meeting. This current letter is based on the views expressed in June. However, I have also circulated it as a draft to the village and I am confident that it does represent the views of the majority of the Parish.

4.2.4 I think it is worth a quick summary of our understanding. We have been told that:

- The purpose of a new Telecoms mast is to replace the existing Airwave mast with one which provides cheaper and higher quality voice and data for the Emergency Services Network (ESN);
- Ideally the Shared Rural Network (SRN) project will also use the mast for mobile phone and data coverage by individuals and businesses, but that this is not the priority;
- There will be a gap in ESN coverage for Widecombe in the Moor without a new mast;
- A mast at Challamoor will point towards Widecombe to remove the gap in coverage;
- There will be little or no improvement in ESN or SRN coverage for Buckland in the Moor from a mast at Challamoor Field; most improvements in our coverage will come from a new mast at Holne.

4.2.5 With regards to the amendments, as far as I can see they consist of four documents:

- An email from the Home Office (HO) to Rachel Gormley at Perry Williams which says it provides coverage plots for the Glebe farm site but does not in fact include them;
- An email from Rachel to DNPA regarding questions raised by DNPA about alternative sites and other issues;
- A design showing what a 'covered solution' for a mast up to 17.5m looks like ;
- Drawings from 2019 of a lattice tower for ESN and Airwave at Glebe Farm (my italics).

4.2.6 The email from the HO adds very little clarity. It seems designed to misdirect and confuse rather than addressing the issues. Perhaps if the data plots were available it would be easier to understand where the HO is coming from. But for example, the email claims that:

- A mast at Glebe Farm will not provide adequate system availability. There is no evidence submitted to support this claim; there is a deal of information provided on how every mast always has plenty of redundancy in transmission and power and hence (presumably) excellent availability
- A mast at Glebe Farm is deemed to be a poor location for the ESN. There is no data supplied to support this statement
- A mast at Challamoor would provide “18 km of major road coverage”. By HO definition, there are no major roads in Widecombe in the Moor nor are there any in the maps we have seen showing the gaps in ESN coverage. Moreover, the nearest major roads are in the opposite direction to that of the antennae on a mast at Challamoor Field;
- A mast at Glebe Farm provides little extra coverage regardless of whether it is 17.5 m tall or 30m tall - it does not make it clear if this is ESN or SRN coverage, but regardless,
- We have been told that SRN coverage is not the priority, so if ESN coverage in Widecombe can be achieved by a 17.5m mast, this should be the preferred option Airwave will be replaced by the ESN yet the Glebe Farm mast is taller because it has an Airwave antenna on top of it. Even if some overlap between Airwave and ESN is needed while the new system beds in, surely the extra antenna can be removed so the mast is lower when it is no longer needed.

4.2.7 The email to DNPA also makes it clear that only a 17.5m mast is needed for ESN at Glebe Farm. This suggests that alternative designs would be possible to a lattice tower because the mast is shorter. The email says that EE either do not use alternative designs or they are not an option available to EE. This is an application for full planning permission in a National Park. Surely DNPA have some say in the design of the mast? Finally, as I understand it one of the issues for Glebe Farm is trees at the site. As far as I know these are conifers which are not native to Dartmoor. If this is correct, then perhaps consideration could be given to removing or cutting back conifers which are blocking the signal and replacing them with native trees. Admittedly this will take time to screen the site, but again, DNPA could ask for larger specimens to be planted.

4.2.8 In summary, I do not think that the additional information adds anything to the case for Challamoor Field as opposed to Glebe Farm. There seems to be a clear desire by the HO to avoid Glebe Farm and determination to use a site in a different parish which will not see benefit from it. Also, the wishes of the landowners of the sites seem to have priority over those who do not own the land but do live next to the Challamoor Field site.

5 National Planning Policy and Guidance

5.1 Paragraph 189 of the National Planning Policy Framework (NPPF) is explicit 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 of landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas and should be given great weight in National Parks and The Broads.

5.2 Paragraph 120 sets out the strategic approach to supporting high quality communications infrastructure to support sustainable economic growth. It is made expressly clear that 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'.

- 5.3 Paragraph 121 states that 'Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development'.
- 5.4 Paragraph 123 goes onto state that 'Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure'.
- 5.5 The Code of Practice for Wireless Network Development in England (Dept for Digital, Culture, Media & Sport) provides guidance to Code Operators (referred to as 'operators' throughout the Code of Practice), including the Mobile Network Operators and wireless infrastructure providers, their agents and contractors, local planning authorities, and all other relevant stakeholders in England on how to carry out their roles and responsibilities when installing wireless network infrastructure. The aim of the Code of Practice is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. The guidance provided by the Code of Practice brings together the principles agreed between operators and local planning authorities, in relation to the siting and design of mobile infrastructure, and the approach to consultation and engagement.

6 Relevant Local Plan Policies

- 6.1 Strategic Policy 1.1 Delivering National Park purposes and protecting Dartmoor's Special Qualities
- Strategic Policy 1.2 Sustainable development in Dartmoor National Park
- Strategic Policy 1.3 Spatial Strategy
- Strategic Policy 1.5 Delivering good design
- Strategic Policy 1.6 Sustainable construction
- Policy 1.7 Protecting local amenity in Dartmoor National Park
- Strategic Policy 2.1 Protecting the character of Dartmoor's landscape
- Strategic Policy 2.2 Conserving and enhancing Dartmoor's biodiversity and geodiversity
- Strategic Policy 2.3 Biodiversity Net Gain
- Strategic Policy 2.4 Conserving and enhancing Dartmoor's moorland, heathland and woodland
- Strategic policy 2.5 The Water Environment and Flood Risk
- Strategic Policy 2.6 Protecting tranquillity and dark night skies
- Policy 4.7 Telecommunications Development

7 Representations

7.1 Support – 4

7.1.2 Summary of support comments:

- The emergency services are reliant on their ability to communicate effectively with their control rooms and other partner agencies and to be able to do this, coverage is crucial.
- We know that our National Parks are rural, sometimes inaccessible, and often a significant time away from major receiving hospitals. This makes it incredibly important that responding agencies can get to the people we are responding to as quickly and as safely as possible.
- Lack of mobile signal effects how medical equipment can be used and monitored remotely.
- Dartmoor is subjected to various permanent, manmade additions to its landscape. These include strings of telegraph and electricity poles complete with large grey substation transformers. Communication masts are in exactly the same category.
- We, like others, do not find the masts visually appealing but consider that the benefits outweigh this and hope that the proposed siting of this mast will impact on the landscape as little as possible. We are delighted to see that the application will comply with the Shared Rural Network scheme, ensuring that all 4 UK mobile network operators, along with emergency services, are able to utilise the mast. This will help to ensure that the number of masts is kept to a minimum whilst delivering connectivity across our rural areas.

7.2 Object – 8

7.2.1 Summary of objection comments:

- The proposed mast would be highly intrusive in public viewpoints both close by (much of Pudsham Down, and the road leading from Cockingford) and from the other side of the valley. It would be an alien feature, with little potential for effective screening. It would contribute unnecessarily to the proliferation of masts which government policy has sought to minimise – especially so in this protected environment, and when it could replace the existing mast at Widecombe.
- The installation at Challamoore field is going to remain a blot on the landscape long after it becomes redundant and outdated.
- The site will bring no benefit to the residents of Buckland in the Moor whose parish it will sit.
- The disruption from construction and the eventual visual impact on that part of the moor would be very unwelcome and permanently damage this part of the moor.
- At the heart of this issue is the lack of a coherent plan from DNPA to manage the proliferation of masts on Dartmoor. There is a new application appearing every month or two, without a framework for saying where masts are needed or what the correct placement of masts should be to achieve maximum comms coverage with minimum masts.
- The mast will also be clearly visible from some of the most visited areas on Dartmoor during the peak visitor season. This is the wrong message to be

sending to external visitors to Dartmoor NP. This proposal for a mast at Challacombe Field will lead to irreversible damage to the visual appearance of Dartmoor in that area, huge inconvenience during the construction phase and cause disruption to the local wildlife, birds and those members of the public who work so hard as volunteers to maintain Pudsham Meadows and other areas nearby.

- The location of the proposed mast is detrimental to the landscape of the area. There is already a mast in Widecombe in the Moor which can be altered to meet the requirements of Widecombe residents. There is no benefit to residents of Buckland in the Moor but rather an intrusive large structure which is not necessary in the proposed site.
- The mast will not fit in at all with the landscape and will be an eyesore to many of the historic houses and cottages and to much of the land in the area.
- Whilst I can see from KTL's supplementary information that other sites were considered, it does not appear that all options were considered within the specified search area and I am not satisfied that the site strikes the optimum balance between the aims of the network programme and the minimisation of visual impact. It is noteworthy that other sites were discounted because the masts would be skylined and have a detrimental impact on the sensitive landscape, but the chosen site clearly also falls into this category for large areas of land and many properties.
- Various surveys and studies have suggested that a mobile mast of this type within 500 metres of a home has a detrimental effect on health especially for young, growing children.
- I do not agree that a 66ft trellis galvanised mast compares to telegraph poles etc especially on a skyline and landscape that is currently unspoilt.
- Following our Parish Council Meeting (Buckland in the Moor) we know that there is already a mast, situated at Bowden Hill in the parish of Widecombe in the Moor that, with only a small amount of improvement work, would provide identical amenities to the proposed mast at this new site.

8 Observations

PROPOSAL

- 8.1 The Home Office is leading a cross-government programme to deliver the new telecommunications network for the emergency services. The current emergency services network (known as e 3 Emergency Services or 3ES) is operated by Airwave, a Motorola Solutions Company. This network has excellent coverage and provides a secure voice communication method for the users; however, the data capability is limited and the network is very expensive to operate. Additionally, Airwave will be decommissioned in the future.
- 8.2 The successor to Airwave will be the Emergency Services Network (ESN) currently will be operated over EE's 4G Network
- 8.3 EE is expanding their network for ESN Operation, as not all areas that require coverage are provided by the existing EE complement of sites. Furthermore, the coverage must be equal to or better than the current Airwave Service. It is worth noting that due to the existing Airwave Network operating on an entirely different frequency band to the EE/ESN Network, there will be negligible network infrastructure/technology commonality.

- 8.4 There are 40 Areas (Polygons) across Great Britain that are not included within the EE Primary Area. These areas will be known as the Extended Area Service (EAS) Network and are the responsibility of the Home Office to ensure coverage, similar to the coverage being provided in the EE Primary Area.
- 8.5 There are circa 292 EAS sites/locations across Great Britain and each location has been determined as critical by the 3ES, which is based upon call/incident data gathered over time. The EAS masts will primarily provide coverage to Major and Minor Roads (defined by operational needs), for voice and previously unavailable high-speed mobile data services to the 3ES in the 292 locations. The EAS masts will be government owned.
- 8.6 The proposal is also part of the Government backed scheme called Shared Rural Network (SRN) which is a collaboration between the MNO's Vodafone and VMO2 (formerly O2/Telefonica) and the Government to improve 4G coverage for people living, working and travelling in poorly served rural areas. An installation in this location will ensure that 4G coverage is provided by the four MNOs – EE, H3G, Vodafone and VMO2.

PRINCIPLE OF DEVELOPMENT

- 8.7 English National Parks were created with two purposes (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and (ii) To promote opportunities for the understanding and enjoyment of the Special Qualities of the National Park by the public.
- 8.8 There is also a social and economic duty on National Park Authorities to seek to foster the economic and social wellbeing of the local communities within the National Park.
- 8.9 Strategic Policy 1.2 supports sustainable development which, amongst other things, supports National Park purposes, makes efficient use of land and infrastructure, in particular by prioritising the use of previously developed land and buildings, and conserves and enhances the character, quality and tranquillity of the National Park and sustains and enhances the setting, character and local distinctiveness of settlements.
- 8.10 The provision of utility, service, transport or recreational infrastructure is one of those development types is permitted in principle in the open countryside of the National Park under Spatial Strategy Strategic Policy 1.3.
- 8.11 Policy 4.7 states that new telecommunications infrastructure will only be permitted where;
- a) evidence demonstrates the service cannot be delivered less harmfully by installing equipment on existing masts, buildings or other structures;
 - b) the equipment is located and designed to minimise its impact; and

- c) the equipment does not cause substantial harm to the character and appearance of the built environment and/or the National Park's Special Qualities, particularly landscape character, heritage significance and tranquillity.

8.12 It is of note that while there is a requirement to ensure that mast and equipment sharing is prioritised over new installations, neither national guidance within the National Planning Policy Framework nor Dartmoor Local Plan policies require a specific assessment of need for new telecommunications development.

ALTERNATIVE SITES/MAST SHARING

8.13 The applicants supporting statement advises that utilising existing masts is always progressed where it is technically and legally possible, and new sites are only developed where there are no viable or accessible alternatives.

8.14 There is an existing telecommunications base station at Glebe Farm (NGR E: 271256 N: 076856) approximately 550m to the west of Widecombe which currently accommodates a 10m shrouded Airwave monopole.

8.15 According to the supporting documentation, in 2019 a proposal was submitted to Airwave to utilise the site a site and design survey was undertaken. At this time this location was only designed to incorporate the Extended Area Services (EAS). If it were to accommodate SRN antennas, due to local topography and the presence of tall trees in the vicinity of the site, the applicant advises that the height a replacement mast in this location would likely exceed 25m. Furthermore, the Home Office has confirmed they have been refused by the landowner to redevelop this site.

8.16 There is also an existing telecommunications base station at Blackslade Farm (NGR E: 272530 N: 075320) approximately 1.5km to the south-east of Widecombe which currently accommodates a 17m slimline lattice TV mast. The owners have confirmed the lease is restricted and it cannot be further developed. Also, it would require significant redevelopment, with suggestion that 30m+ lattice mast would be required to accommodate all apparatus required to serve the EAS & SRN.

8.17 Regarding possible alternative sites, the applicant has provided details of nine further sites (all greenfield) which were considered as part of the selection process and discounted, along with the reasoning for not proceeding.

VISUAL AND LANDSCAPE IMPACT

8.18 Strategic Policy 2.1 states that all development should conserve and enhance the character of the Dartmoor landscape by respecting the Valued Attributes of the Landscape Character Types identified in the Dartmoor National Park Landscape Character Assessment and ensuring its location, layout, scale and design conserves and/ or enhances what is special or distinctive about landscape character.

8.19 The application site is located in the corner of a pastoral field within the rolling northwest-facing hillside of Pudsham Down. To the northeast lies Blackslade Down, to the east is Rippon Tor, and to the southeast is Buckland Common. To the east the land falls steeply to the East Webburn River valley and Cockingford Bridge.

- 8.20 The application site is within Landscape Character Type 2D: Moorland Edge Slopes. Valued attributes of this landscape type include the following:
- A rich and intricate landscape full of contrasts.
 - Strong pattern of medieval fields with prominent Devon hedgebanks and dry stone walls.
 - Pastoral character of fields contrasting with areas of heathy moorland.
 - Strong local vernacular of granite, colourwash and slate.
 - Spectacular views to the moorland core of Dartmoor as well as the surrounding countryside outside the National Park, including granite church towers as landmarks.
 - Traditional orchards
 - Features associated with the area's mining heritage and historic land uses.
- 8.21 An Increased numbers of telecommunications masts on the periphery of the moor as a result of increased demand for mobile infrastructure and superfast broadband is identified in the Landscape Character Assessment as one the threats/forces for change for this landscape type.
- 8.22 The proposed mast and compound would be located adjacent to a hedgerow within a small copse of mixed trees. The application site is away from the public road but adjacent to an existing farm track along which there is public access. The proposed mast, fence compound and associated equipment would be visible for users of the track. The proposed mast would also be plainly visible from the public road, most notably for those users travelling west from Buckland Common direction.
- 8.23 The landscape surrounding the site comprises undulating medium sized agricultural fields enclosed by Devon hedge banks. To the north and west there is a mosaic of conifer, mixed and broadleaved woodland, less so to the south and open moorland to the east/northeast.
- 8.24 The application is accompanied by a Landscape and Visual Impact Assessment (LVIA). In its summary of landscape effects it concludes that the receiving landscape is of high sensitivity but has the capacity to accommodate the proposed development due to the deeply folded landform and screening from public roads afforded by the dense hedgerows flanking the winding sunken lanes, together with small blocks of woodland. The steep sided valleys would help to obscure the proposed telecommunication mast from medium-long range views. While the mast will inevitably break the skyline form views that are slightly below, the rising land to the east and north will help to backcloth it, subsuming it within the wider landscape. It is considered that any landscape effects would be long term but reversible.
- 8.25 The LVIA includes an appraisal of the visual effects of the proposed development from 11 viewpoints which were selected to represent typical views from key receptors at varying distances and orientations from the site. The visual effects range from being graded 'major-moderate' for closer range views (less than 251m) and 'moderate-minor' for longer range views. It concludes that there are likely to be significant effects only at close range to the proposed mast and there would be no significant impact on nearby sensitive receptors, such as neighbouring properties, cultural heritage assets, local roads and public rights of way

- 8.26 The submitted LVIA has been independently appraised and confirmed as being carried out in an appropriate manner and acceptable in terms of its quality and comprehensiveness.
- 8.27 The applicant has been challenged on the design of the proposed mast, with a suggestion that a shrouded pole might be preferable in this location, however officers have been advised that an alternative design solution is not possible in this location due to difficulties over maintenance and access. The antennas are all unshrouded for technical reasons. The higher the radio frequency the more signal attenuation there is. The higher frequency of the latest 4G antennas are unable to operate effectively through the Glass Reinforced Plastic that the shroud is made up of and as such if these antennas were to be shielded then they would not be able to provide the necessary coverage to the target coverage area.
- 8.28 A modern lattice communications tower is clearly not a traditional feature in the landscape. The proposed installation would be in an undeveloped field and remote from buildings. Although the mast would be near to mature trees, given its height and position on a hillside it would be visible from long distances away including from a variety of public rights of way and open access land. It would also be visible from close quarters, including from the access track and public road to the east where it would appear as an overtly modern structure.
- 8.29 There are however building groups in the vicinity of site as well as a network of dense hedgebanks with sporadic mature trees growing out of them which add vertical features to the landscape. There is also consideration for the rising ground to the west which some distant views will reduce the prominence of the structure.
- 8.30 Having regard for all matters, it is considered that the proposed development would not conserve and/or enhance the character of the local landscape and would have a negative visual impact on the area, contrary to the Strategic Policies 1.2 and 2.1 of the Local Plan.

AMENITY

- 8.31 Policy 1.7 states that development should not have an overbearing and dominant impact or introduce levels of noise, vibration, lighting, odours, fumes or dust that would adversely affect human health or quality of life.
- 8.32 The proposed mast will require a generator which will have a noise output associated with it however as the site is approximately 200m from the nearest residential property it is not considered that there would be a material impact on local residents.

ECOLOGY

- 8.33 An ecological appraisal has been submitted with the application which reports that the application site is not within or adjacent to any area of priority habitat and no evidence of presence of badgers or hazel dormice were identified. This notwithstanding, the habitat off site in particular the intact species-rich hedgerows immediately north of the demise area, are considered to make a significant contribution towards local biodiversity, providing habitat and foraging opportunities for species.

- 8.34 In light of the above the appraisal recommends a precautionary approach, including requiring a badger survey to be carried out within 3 months prior to commencement of proposals (and should evidence be found a method statement should be provided to the LPA for approval prior to works commencing) and avoiding ground disturbing activities during dormice hibernation species.
- 8.35 A Construction Environment Management Plan (CEMP) is also recommended to ensure habitat in the vicinity of the site is protected during construction. This would be a condition of any approval.

TREES

- 8.36 The boundaries of the corner of the field where the application site is located are formed by traditional hedgebanks with vegetation (including trees) growing from the top.
- 8.37 The proposed development requires the removal of one oak tree (T1). The tree is classified in the submitted Arboricultural Impact Assessment as a Category C and described as 'unremarkable with limited merit and low landscape value'. The loss of this tree is considered acceptable, subject to suitable replanting nearby.
- 8.38 The proposed access to the site compound would comprise a short section of gravel track. No details of this track have been submitted and without mitigation it is likely that it would have a negative impact on the root system of the oak tree (T2) growing out of the bank adjacent to the access through compaction and severance during construction. A condition is recommended to further consider the most appropriate method for ensuring this tree is adequately protected during construction.
- 8.39 It is also recommended that further exploratory works (for example, trial pits or trenches to check for root depth, density and distribution) are undertaken to confirm the assumed root protection area for the group of trees growing on the bank (G1) to the south-west of the site to ensure that satisfactory protection is afforded to these trees given their importance in association with the proposed development. This could take the form of a pre-commencement condition requiring details of exploratory works to be submitted, followed by submission of a method statement for this part of the site.

PLANNING BALANCE

- 8.40 The proposal to provide a new ground-based telecommunications site at Challacombe is part of government drive to provide reliable 4G coverage to the Emergency Service Network (ESN). The site at Widecombe one of 40 areas identified within the Extended Area Service (EAS) network which forms some of the most rural and remote parts of the country. The installation in this location would provide coverage to approximately 18km of major roads (in this case the B3387) and approximately 100km of minor roads in the area, as well as to the village of Widecombe in the Moor and increased coverage to Buckland in the Moor, Cockingford, Higher Dunstone, Jordan, Ponsworthy, and Poundsgate.

- 8.41 The proposed development is also part of the Shared Rural Network (SRN), a government backed scheme between the mobile network operators to get geographical coverage from at least one operator over 95% of the country by the end of 2025. It has been designed so that all four operators can use the same structure and radio base station to also provide 4G coverage to this area of Dartmoor. Currently there is very limited mobile coverage in this area by any mobile operator. The provision of coverage will not only allow for 999/112 Calls to be made by the public in areas that have historically had insufficient commercial mobile phone coverage (known as 'Not-Spots') but also provide high quality 4G service provision to residents, businesses, and visitors alike to this area of Dartmoor.
- 8.42 Paragraph 118 of the National Planning Policy Framework explains that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Paragraph 119 of the Framework states that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, and that 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.
- 8.43 The location of the alternative sites explored by the appellant and an explanation on why these have been discounted has been provided. It is considered that the appellant has provided adequate justification for discounting other sites.
- 8.44 There is no doubt the lattice tower would have a clear visual impact, contrasting with the prevailing character of the National Park landscape. Despite the slimline lattice design of the tower, the overall height and antennas/dishes at the top of the tower would draw the eye. The visual impact would be negative as it would be a modern utilitarian feature with vertical prominence, incongruous in the National Park landscape.
- 8.45 The impact would be compounded by fenced enclosure and associated equipment within which would be clearly visible at close quarters by users of the adjacent field track and which would further erode the sense of tranquillity and peace which is currently enjoyed for those passing by the site.
- 8.46 There is also an archaeological objection regarding the cumulative impact of the proposed development which it is considered fails to conserve and/or enhance the local historic environment.
- 8.47 Notwithstanding these matters, the consideration of officers in respect of this proposed development is that, on balance, the harm identified would be outweighed by the considerable public benefits of delivering reliable mobile coverage to both the emergency services network and residents, businesses and visitors through the SRN. Consequently, this material consideration outweighs the conflict with the development plan in the particular circumstances of this case.

9 Member Site Inspection – 21 February 2025

- 9.1 Members of the site inspection panel convened adjacent to the site where the Planning Officer outlined the application proposal. Members were shown the location of the proposed mast.

- 9.2 The site inspection was attended by representatives from Buckland-in-the-Moor Parish Meeting and Widecombe-in-the-Moor Parish Council.
- 9.3 The Chair queried the impact on the proposed construction traffic on the existing trees on the south-western boundary. The representative from EE advised that it was likely that the proposed equipment would be lifted over the hedgebank from the access track.
- 9.4 The planning officer confirmed that the submission of a construction management plan is one of the recommended conditions which would deal with this matter.
- 9.5 The planning officer confirmed that the mast would be for use by the emergency services and shared rural network.
- 9.6 The Buckland-in-the-Moor Parish Meeting representative reiterated their objection to the application.
- 9.7 The Widecombe-in-the-Moor Parish Council representative reiterated their support for the application.

10 Additional information received since February Development Management Committee meeting

- 10.1 On the issue of alternative sites, Members will note in the committee report at paragraph 8.15 above it states that the applicant has been refused consent by the landowner of the Airwave site at Glebe Farm to re-develop the site.
- 10.2 Since the previous committee meeting, Officers have been provided with a copy of correspondence to indicate that the landowner of the Airwave site may now be willing to consider a new mast in this location.
- 10.3 The applicant has responded stating that site surveys were undertaken in 2019 with a view to redevelopment of the site. Following discussions with the landowner it is stated that the developer was sufficiently convinced that there was no reasonable likelihood of a redevelopment being secured.
- 10.4 At this time the project was for ESN only (not including SRN as now currently proposed). The applicant has advised that a new installation combining both ESN and SRN would require a lattice mast approximately 25m high to accommodate all necessary antenna and would likely involve removal of a number of existing pine trees which are growing around the site to achieve the required line of sight necessary to deliver the ESN service. It is also stated that this site was not the radio planner's preference to provide optimum coverage to the area.
- 10.5 Notwithstanding these matters, and accepting that final scheme drawings have not been submitted to enable a full assessment of impact, Officers consider that the redevelopment of this site comprising replacement of the existing 9m shrouded mast with a lattice mast up to 25m in height, would have a significant impact on the Special Qualities of the area and would likely breach the threshold of substantial harm set out in Policy 4.7.
- 10.6 Based on the information available, therefore, it is not considered that this site represents a viable alternative to the proposed development at Challamoor.
- 10.7 On the issue of the access to the site, an additional location plan has been received which shows the red-line application site extended to include the access track from the field up to the point where it meets the public highway.

10.8 A full public re-consultation has been initiated which runs until 2 April 2025. At the time of this report no additional comments have been received. Any responses which are received in the intervening period will be verbally reported to Members at the Development Management Committee meeting.

DEAN KINSELLA