



WEST HANNINGFIELD PARISH COUNCIL



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27th March 2023

Dear Ms Perry

PRECONSULTATION – PROPOSED RADIO BASE STATION INSTALLATION AT CFD22402_CHURCH ROAD, CHELMSFORD, ESSEX, CM2 8UQ (E572758 N199723)

West Hanningfield Parish Council strongly objects to this proposal.

Despite being given very short notice the Council has worked very hard to understand your proposal, a task that has been made even more difficult since the documentation does not provide sufficient detail and is in places contradictory. The Parish Council firmly believes that more time is required for the Council to fully understand the proposal and to gather appropriate feedback from all parties involved.

The Council believes the proposal contravenes both existing Telecoms Codes of Practice for equipment siting, and local planning guidance. Given that this is the case, the Parish Council believes that a formal planning application should be made in order to ensure that there is adequate time given for due diligence on the proposal, rather than using the Prior Approval procedure.

Furthermore, the Parish Council very much hopes that you will reassess your proposal to site this equipment in this location, and that you will work with the Parish Council to find an alternative site that meets your requirements whilst ensuring safety and protecting the character of West Hanningfield.

Safety Aspect

The site sits very close to the point where a 30 mph limit changes to 40mph with the associated speeding up of traffic on that side of the road and traffic still slowing down following a dangerous bend on the other. It is close to a busy road junction, to several individual driveways, a field gate and to the entrance to a sizeable residents' car park. Traffic often bottlenecks in this area and verge is routinely used to provide a "soft shoulder". Without this capability, the risk of accidents increases. Of significant concern is the sightline from Middlemead turning left being interfered with by the ground level infrastructure.

The positioning of the monopole so close to the road risks such an accident involving the pole itself or the ground level ancillary equipment. The injury caused by hitting such a substantial object at between

30 and 40 mph would likely be life threatening. The site is within 100 yards of the local primary school. During school dropping off and picking up times the road at this point is extremely busy with both vehicles and pedestrians and it is at those times that the risk would be highest.

This verge is regularly used by pedestrians, including children using this route to walk to and from school in the absence of a footpath on either side of the road. At the proposed site, it is also used by walkers, dog walkers, cyclists and horsepersons to get out of the road when traffic is flowing both ways, providing for the safety of other road users. Currently there is sufficient space to do that and to proceed further along the verge without crossing the road. Siting the monopole at this point will significantly reduce, or more likely remove, that capability.

It is worth noting that this stretch of road is an official section of, and is regularly used by walkers following, the culturally important St Peter's Way and between the Seaman's Lane bridleway and the continuing footpath to the school. Please see the links below:

https://www.essexhighways.org/uploads/files/st_peters_way.pdf

<https://britishpilgrimage.org/portfolio/st-peters-way/>

The site is also very close to the SSSI of Hanningfield Reservoir and its significant migratory bird population, together with large numbers of soprano pipistrelle bats and a multitude of other wildlife species. No assessment appears to have been made on the impact on these.

The route is also frequently used by horsepersons both riding to and from the bridleway and along the lanes around the village in general. Horses are sensitive to unnatural structures and in particular to unnatural and sudden noises such as those that will be made by cooling fans switching on and running. Such things can cause the animals to shy, constituting a danger to them, their riders and to other road users.

Many cyclists both from the Village and more widely also use the route. West Hanningfield's roads including Church Road are well known and well used by cycling clubs from all over mid-Essex.

Visual Aspect

The proposed installation will be very intrusive and will have a negative impact on the rural surroundings and the village of West Hanningfield. It will result in significant negative harm to the visual amenity of surrounding residential occupiers.

The site sits between and within sight of two of the most visually important areas of the Village, these being:

- the green area around the entrance to the Village from Middlemead with its Village Sign, which is kept in excellent order by residents of the surrounding properties through mowing the large area of grass, planting and cultivating spring and summer flowers and managing the verge, hedging and mature trees, and;
- the Village Green, which sits immediately outside the Three Compasses, a Grade 1 listed 15th Century pub, at the edge of an area containing several other listed properties at the entrance to the Village from Lower Stock Road and Holliday Hill.

Between these two areas is a rural, native thorn hedge and several mature trees, none of which are more than half the height of the proposed mast. There are no buildings or equipment of any kind on that side of the road; on the other there are exclusively homes. There is no industrial or commercial development within several hundred yards of this site, except the previously mentioned 15th century pub.

Siting your mast and its sizeable ancillary equipment in this location will destroy the ambience of both areas not only for residents but also for the significant numbers of walkers, dog walkers, cyclists and horse riders that use this road daily largely because it is devoid of visually inappropriate developments of this kind.

Amenity Aspect

The Parish Council understands that there is a need for 5G coverage in rural areas in order to deliver high-speed internet and the Council supports provision of that coverage. The Council also understands that proposals like this one cannot be challenged on the basis of whether such need exists. However, it does not believe that proposals like this one can completely ignore the fact that fast internet is already available in the area covered by the proposed 5G signalling equipment, either through 5G from another source or through fixed line fibre. The Council believes that there is a need for balance.

With that in mind, it is extremely unlikely that the benefit to the majority of, if any of, the residents affected by this proposal will outweigh the safety and visual amenity cost associated with the siting of this equipment in this location. There are other locations in the area - brownfield, agricultural and within the green belt - some of which have already been used to site equipment that delivers an acceptable mobile service with a safer and less intrusive outcome. The Parish Council would be happy to engage with you on this topic.

It is also quite clear that the investment required for this development cannot in and of itself be justified by the commercial value of a solely West Hanningfield customer base for an individual 5G provider, therefore it must be being proposed for reasons of additional market penetration, either current, planned or likely. If that is the case, then that should form part of the proposal so that residents can understand the likelihood of further development on the site and/or equipment.

Note also that the area local to the proposed mast already has access to high speed broadband.

Local Planning Guidance

The West Hanningfield Village Design Statement, see <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-local-plan/neighbourhood-plans-and-village-design-statements/village-design-statements/> and **EB161 West Hanningfield Village Design Statement** adopted as part of Planning Guidance by Essex County Council in 2011, has the following to say about developments of this nature:

- The mobile phone/telecommunications masts should be better hidden or disguised. Thus when a proposal is made for such equipment, operators should ensure that the siting and design of the equipment will enhance the landscape and strengthen the identity of the Village.
- Verges and ditches should be kept free of unnatural obstructions and managed to encourage wildlife and wild flowers, whilst maintaining safety.
- The green rural spaces provide the Village with much of its character and are important visually and for their informal recreational value – this character should be protected.
- Developments should be sensitive to the immediate surroundings and should not dominate them.

The Parish Council does not believe this proposal meets any of these objectives.

Code of Practice for Wireless Network Development in England

This Code of Practice states:

There is insufficient evidence that the following elements of this code of practice have been followed:

21. Siting and design should be considered throughout the development process and early discussion between operators, local planning authorities **and communities** about the location, design and style of the proposals should be encouraged for clarifying expectations and reconciling local and commercial interests.

22. The choice over the site selection and design of equipment is primarily dependent upon the coverage and **capacity requirements** and technical constraints **of a specific location**, although **operators should make efforts to reduce visual impacts where possible**.

23. There should be a presumption in favour of facilitating sustainable network development and, as such, operators and local planning authorities, as well as all other bodies involved in the deployment process, should work together to ensure connectivity needs are met and **find viable solutions to deployment issues**.

25. When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles: • **Installation on existing buildings/structures: where possible**.

28. The siting of wireless infrastructure will influence which design options are most appropriate for reducing the visual impact. The following design principles are important considerations:

Protecting visual amenity: a comprehensive assessment of the area should be carried out to ensure that the design solution appreciates the context of its location by fitting with both the site and the wider setting. Proposals should take into account protected sightlines, landmarks and vistas. This is particularly important when mobile infrastructure is located in protected landscapes or heritage sites and their settings (see 'Natural Environment and Heritage Assets' section below). In light of the above, and the guidelines in:

- Paragraph 32 - siting on and footways
- Paragraph 33 - highway safety
- Paragraph 34 – listed buildings
- Paragraph 36 – trees
- Paragraph 50 – heritage sites
- Paragraph 57 – SSSI

The Parish Council does not see sufficient evidence that this code of practice has been properly followed.

Telecoms Industry Cable and Pole Siting Codes of Practice - Fixed Line

Additionally, the proposal appears to break the following conditions in this Code of Practice. Although it is understood that this proposal is specifically related to mobile telecommunications services, it is believed this Code of Practice is relevant to your proposal since this local area already has high speed fibre broadband, so there is no absolute need for a 5G service to provide it. The Parish Council therefore holds that if a mobile telecoms provider has a desire to provide such a service, that provider should be held to the same standards that would have been required of a fixed line provider to do the same:

4.2.4 To minimise the visual impact, the cabinet should not be sited in a prominent position at a junction or on a bend of the public maintainable highway.

Other prominent locations on grass verges or grassed amenity areas should be avoided unless there is a technical justification not to do so.

4.2.5 While cabinets will generally be installed on the publicly maintained highway, where the siting of a cabinet on private land would be both commercially and technically feasible and result in less visual harm, then the Code Operator should investigate that option and give due consideration to its implementation.

5.7 The siting of poles adjacent to any listed building and/or Scheduled Monument should be avoided.

Yours Sincerely

Lucy White

Miss Lucy White
Parish Clerk – West Hanningfield Parish Council