



# The Planning Inspectorate

3M Kite Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Direct Line: 03034445284  
Customer Services:  
0303 444 5000

Email: [north1@planninginspectorate.gov.uk](mailto:north1@planninginspectorate.gov.uk)  
[www.gov.uk/planning-inspectorate](http://www.gov.uk/planning-inspectorate)

Your Ref: 231548

Our Ref: APP/W1850/W/23/3329175

Mr M Tansley  
Herefordshire Council  
P O Box 230  
Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

02 April 2024

Dear Mr M Tansley,

Town and Country Planning Act 1990

Appeal by Cornerstone

Site Address: Land at Coed Major Farm, Cusop Dingle, Craswall, Herefordshire,  
HR2 0PX

I enclose for your information a copy of the appellant's final comments on the above appeal(s). Normally, no further comments, from any party, will now be taken into consideration.

Yours sincerely,

***Darren Cryer***  
Darren Cryer

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Our ref: CTIL\_307062 Coed Major Farm (SRN)  
Your ref: APP/W1850/W/23/3329175

27 March 2024

Mr Darren Cryer  
The Planning Inspectorate  
3M Kite Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Clarke Telecom Ltd  
Unit E  
Madison Place  
Northampton Road  
Manchester  
M40 5AG

Email: [north1@planninginspectorate.gov.uk](mailto:north1@planninginspectorate.gov.uk)

## BY EMAIL

Dear Mr Cryer

### **APPELLANT'S FINAL COMMENTS APPEAL BY CORNERSTONE**

#### **PROPOSED BASE STATION INSTALLATION AT CTIL\_30706200 LAND AT COED MAJOR FARM, CRASWALL, HEREFORD, HR2 0PX (NGR E: 325408, N: 237200)**

Further to your letter dated 19 March 2024, attaching the LPA's Statement of Case and the third party representations in relation to the above appeal, please find below the appellant's final comments in relation to the LPA Appeal Statement and third party representations.

It is not the intention of the appellant to repeat what has already been set out in the Appellant's Appeal Statement but for the avoidance of doubt and for ease of reference for the Inspector, where the appellant considers it necessary, paragraph numbers from the Appellant's Appeal Statement, the LVIA, the LVIA Addendum which explain points already addressed will be highlighted.

The Council's Statement notes that the site is located within a highly sensitive landscape visible from Offa's Dyke and Cat's Black walking routes. The height of the mast at 30m is considered by the Council to be a vast structure in the context of this locality.


The appeal site is some 400m outside the Brecon Beacons National Park. The LVIA notes that there would be very limited visibility within the National Park itself, limited to some small areas at its eastern boundary.

As highlighted in the LVIA submitted with the application documents and the appeal submission, the Offa's Dyke Path runs approximately 600m to the south of the site at the closest point. Viewpoint 4 (Appendix CTL 19 of the Appellant's Appeal Statement) also included in the application submission is a representative view experienced by walkers along Offa's Dyke path and adjacent open access land.

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Registered Address:  
Cornerstone Telecommunications, Infrastructure Limited,  
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.  
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VAT No. GB142 8555 06

 Cornerstone, Hive 2,  
1530 Arlington Business Park,  
Theale, Berkshire, RG7 4SA

The proposed mast whilst visible on the horizon just over 1km away would be mostly backclothed by landform in the view, with only the top of the mast appearing on the skyline. The lattice design and recessive matt finish would reduce its prominence in the view. Change would be experienced by users of Offa's Dyke path for approximately 1km to the south of the viewpoint and from some of the adjoining open access land. Lower parts of the mast would be screened by adjacent trees. The magnitude of change would be small on this high sensitivity receptor resulting in minor adverse effect.

Viewpoint 5 is located on open access land, east of Offa's Dyke path. The LVIA explains that this viewpoint is representative of views experienced by those within the open access land, those walking along Offa's Dyke and nearby minor road users. The view looks over an expansive landscape. Whilst the mast would be visible in the distance on the horizon, it would appear as a very small element on a horizon which is dominated by the distinctive eye catching form of Hay Bluff to the west. The prominence of the mast would be reduced by the lattice design and recessive matt finish. The lower parts of the mast would be screened by the block of trees at Coed Major Farm. Change would be experienced by those walking along Offa's Dyke path for approximately 1km to the north, and from part of the adjacent areas of open access land, with the effects reducing with distance towards the north. The magnitude of change would range from small to very small. A very small to small magnitude of change on this high sensitivity receptor would result in minor adverse effects and below.

The proposed mast is not located within the Black Mountains Landscape Character Assessment (LCA). As such, the LVIA states that the proposal would not have direct effects. The theoretical visibility of the proposed mast would be limited to a small part of this LCA on the northern flank of Hay Bluff. Areas further into the National Park would be screened by the initial high ground. Where the mast is visible, as demonstrated by Viewpoint 4 in Appendix CTL 19 of the Appellant's Appeal Statement, the mast would be backclothed and the lower parts of the mast would be screened by the adjacent woodland. The mast would be visible from only a small part of this LCA. It would have an influence that would be localised and limited. There would be limited change to a very small part of an extensive landscape visible from very elevated ground, so there would be a small magnitude of change locally to the north flank of Hay Bluff and a negligible effect on the character of the wider LCA. A small magnitude of change on this high sensitivity landscape receptor would result in a localised minor adverse effect on the Black Mountains LCA.


The Appellant's Appeal Statement at paras 6.48 highlights that the ZTV demonstrates that the site will not be visible from the vast majority of Cat's Back footpath. It will be visible only on a very small section of the path as shown by a red line on Figure 10 of the Appellant's Appeal Statement. Both the LVIA and the LVIA Addendum, the former included with the original planning application and latter with the appeal submission, reiterates that the ZTV should be viewed as a 'worse case extent' as it does not take into account existing vegetation or trees and is a bare earth representation. In reality this is not the case. The existing woodland, such as New House Wood and the shelter belt of trees located directly adjacent to the site, will provide a screening effect.

The Council maintains their view that the proposal will be highly visible and significant in terms of the setting of designated assets. As highlighted above and in the LVIA and Addendum, the author of which is a chartered landscape architect, has used their professional judgement based on the ZTV and photowires to determine the magnitude of visual change as moderate at most in relation to the Enclosed Moors and Commons LCT, High Moors and Commons LCT, High Hills and Slopes LCT and moderate to minor to representative Viewpoint 3. The magnitude of change in relation to all other LCTs/LCAs and representative viewpoints is minor adverse.

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The Council state that the proposal has not evidenced enhancement to the landscape or how it would improve the enjoyment of the highly valuable landscape. The appellant has already addressed these comments in its appeal statement at paras 6.17-6.18. Consequently, this rebuttal will not repeat these comments apart from to emphasise that proposals should **conserve** and enhance natural, historic and scenic beauty assets and important landscapes and environmental assets. The Appellant's Appeal Statement sets out how the proposal seeks to conserve the sensitive landscape so far as practicable, through its siting and design taking into account the technical constraints and constrained parameters set out by the Government with regards to location and the operators geographical network deficiencies.

Minimising the impact of telecommunications development via shielding from trees regardless of how they got there (e.g. 1940's plantation or self-seeded), is supported through the Framework and in the Code of Best Practice. It helps to filter views of the installation within the landscape. Planning applications have to be determined on what is currently in situ. To suggest that the trees might be prone to natural felling due to the exposed location is not based on any arboricultural evidence. Furthermore, the owner of the site has confirmed that these trees provide a wind break from the prevailing westerly winds off the Welsh hills and therefore the owner will not be felling them.

The Council, whilst recognising the poor mobile coverage in the area, states that the submission was not considered to sufficiently evidence the social benefits throughout the area that the mast would serve and consequently the level of improvement upon current service provided. The Council go on to state that it is not considered that sufficient detail has been provided to tilt the balance in favour of the public benefits to be derived.

The appellant disputes the Council's stance that insufficient evidence has been provided to demonstrate the public benefits of the proposed scheme in the area. As set out in para 1.3 viii of the Appellant's Appeal Statement, protecting the nearby designated areas is not merely about protecting the landscape but also remembering that this area is a living and working environment. Inadequate digital connectivity pushes people to move away from the area and discourages the younger generation from staying in the local community.


The Appellant's Appeal Statement, and indeed the original Supplementary Supporting Information Statement explained that the proposal is part of the Government backed scheme called Shared Rural Network (SRN). A collaboration between the Mobile Network Operators (MNOs) Vodafone, VMO2 and Three and the Government to improve 4G coverage for people living, working and travelling in poorly served rural areas e.g. see paras 3.3 of the Appellant's Appeal Statement. Para 3.5 of the Appellant's Appeal Statement went on to explain that the appellant is delivering the SRN on behalf of the MNOs Vodafone and VMO2 and this appeal is part of the legally binding obligation to fill the geographical gap in 4G coverage in the Craswall area of Herefordshire (paras 3.2-3.7 of the Appellant's Appeal Statement). Helping to ensure the Government's legally binding target for geographical coverage from at least one operator to 95% of the UK by 2025 is met, broadening consumer choice for a fast mobile broadband service in rural areas.

The appellant also wishes to highlight that twice within the LPA's Statement of Case, the Council refers to 5G coverage that the proposed scheme would provide acknowledging that there are social and economic benefits derived through such coverage. However, neither the original planning submission nor the Appellant's Appeal Statement make any reference to 5G being provided. The SRN programme is designed to provide 4G geographical coverage to 95% of the UK by 2025. This was clearly set out in both the original planning application Supplementary Information Statement and again throughout the Appellant's Appeal Statement (see the following paras which confirm that the site is to provide 4G coverage 1.3 ii, 1.3 iv, 1.3 vi, 1.3 viii, 1.3 ix, 3.2 – 3.11, 3.20 – 3.23, 3.25 – 3.31, 3.38 – 3.44, 3.58, 3.60

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– 3.62, 3.85 – 3.91, 3.111, 3.114 – 3.115, 3.119, 5.5.2 – 5.5.3, 5.7.2, 5.7.5, 5.7.7 – 5.7.8, 5.7.12 – 5.7.14, 6.6 – 6.7, 6.9, 6.12, 6.18, 6.20, 6.64, 6.67 – 6.68, 6.73, 6.75 – 6.77, 6.79 – 6.80, 6.82, 6.97, 6.101, 6.103, 6.110, 6.114 – 6.115, 6.118, 6.123 – 6.125, 6.140, 6.143 – 6.145, 6.147 – 6.148, 6.150 – 6.151, 6.153, 6.161, 6.163, 6.164, 8.1 iii, iv, vi, vii, viii, and ix).

This highlights that the Council has not paid attention to the information provided both during the application stage and now in this appeal submission. As noted in the Appellant's Appeal Statement at para 5.5.3, the 3G network is to be switched off imminently across the UK by all the main mobile network operators, thus 4G is even more important to build resilience into the network. The Council's own Fastershire initiative acknowledges this. This is why the detail in the appellant's statement is important including the pixel map constraints.

Para 3.9 of the Appellant's Appeal Statement set out the real tangible benefits for people and businesses such as communicating with friends and family, boosting tourism and agriculture providing access to emergency services, 4G can provide access to superfast broadband where fibre broadband is not yet available. Both Herefordshire and Gloucestershire County Council have a Fastershire Broadband project to bring superfast broadband to homes and businesses across the 2 counties and part of this utilises 4G mobile coverage. See section 5.5 of the Appellant's Appeal Statement for further details.

The appeal scheme will close the digital divide ensuring people living, working and travelling in this poorly served rural area will have access to the same digital connectivity as those living in more built up areas.

Both the application and the appeal statement highlighted that the proposal would provide 4G coverage for 2 mobile operators to Craswall and its surrounding area including several popular walking routes as well as rural communities. The coverage plots indicate the gap in geographical coverage especially around the Craswall area and that the proposed scheme would provide high quality 4G coverage to the whole cell area. It would bring significant social and economic benefits to those living, working, visiting and travelling in the area. See paras 3.19-3.58 of the Appellant's Appeal Statement for further details and national support for better rural coverage.

The Government provides clear and unequivocal support for sites in rural areas such as this one. It has dedicated an entire project with the Mobile Network Operators to ensuring 95% geographical coverage to the whole of the UK by 2025, such is the importance it attaches to 4G coverage. Not only is the Government supporting the project it has invested £500million of public money to this project with a further £535million being invested by the operators. If the Government considered that sites in National Parks, AONBs or SSSIs were inappropriate it would not be insisting that the operators provide such sites in these areas via the pixel maps. It would have blocked out these sensitive locations. Instead of that the Government, via Ofcom, made a legally binding obligation upon the operators to provide coverage to such rural areas. There is even a House of Commons Rural Mobile Coverage in the UK: Not Spots and Partial Not Spots document which sets out the SRN project and the funding that has gone into it. It also indicates the two issues with mobile coverage in the UK: not spots where there is no coverage and partial not spots meaning that customers in these areas have limited choice about their mobile providers. The appeal site is one such partial not spot.


The House of Commons document called for the SRN programme to be delivered without delay and for mobile operators to be closely held to their commitments.

In an email to the case officer whilst the application was being considered, dated 22.6.23 and reproduced at para 3.119 of the Appellant's Appeal Statement (and appendices 10 and 11) the supportive policy and strategy documents were noted adding significant weight to the benefits of the proposal as a

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counterbalance to the perceived harm where the Wireless Infrastructure Strategy advocates SRN, the House of Commons document on Not Spots and Partial Not Spots directly mentions SRN, the UK Levelling up White Paper where telecommunications is one of the missions, SRN documents highlighted and attached which demonstrate the practical, material, socio-economic benefits and the local Council's own initiatives and aspirations within the Herefordshire Digital and Communications Strategies were set out. Consequently, it was stated that there were local, regional and national support for the material benefits of what is trying to be delivered which should hold significant weight against the perceived harm. These policies were also detailed in section 5.5 of the Appellant's Appeal Statement outlining the benefits.

The Head of Operations for Broadband at Fastershire also emailed the case officer outlining the support for the proposal advising that it had been sensitively sited and much more so than other masts in the AONB see para 3.120 of the Appellant's Appeal Statement and appendix CTL 26. Section 5.5 of the Appellant's Appeal Statement also acknowledges the importance of 4G. Fastershire is aware that 3G will be switched off soon by all the main operators so they want 4G improved, to ensure no loss of service, and for resilience such as for the elderly and vulnerable in the local communities to enable emergency services and digital access. Access to defibrillators in local village halls could be compromised if no mobile signals are available to allow people to get the codes to unlock them. Fastershire recognise the important role of Agritech. It is a big issue for farmers in Herefordshire who use drones to manage flocks and therefore need access to decent broadband to access AI and the Cloud.

It is quite staggering that the Council continue to claim that the benefits of the proposed scheme have not been sufficiently evidenced. Notwithstanding the above local, regional, and national support policies for this development, which set out the benefits, and that were also highlighted to the Council during the application and in the Appellant's Appeal Statement and that the lack of coverage is also a strong material consideration, see paras 6.75-6.108. This section of the appellant's statement highlighted the consequences of a lack of coverage and how bridging the gap is fully supported locally and nationally.

The Appellant's Appeal Statement then goes on to fully set out the economic and social benefits of providing the high quality 4G coverage technology to a large area of Caswall which currently has no such coverage for the operators customers or their Mobile Virtual Network Operators (MVNOs), 8 in total, who buy network space off them (see paras 6.109-6.168).


Given all the evidence regarding the importance of the proposal, the support it has locally, regionally and nationally due to the clear economic and social benefits and the consequences of not providing this once in a lifetime opportunity for 4G service provision, for the Council to still claim not enough evidence has been provided setting out the benefits, must mean that the Council have ignored all these highlighted benefits, even when they are set out in black and white not just by the appellant but the benefits are published by the Government, regionally as well as by their own Council.

The Council states '*The appellant's statement of case also relies on improved coverage encouraging tourists to utilise the area, however the local planning authority maintains that this is not considered to enhance the draw to and enjoyment of the important landscape*'. This ignores the essence of the Appellant's Appeal Statement, which didn't state that the coverage was needed largely to encourage tourists. Far from it, throughout the Appellant's Statement it is emphasised that this is a living and working environment. The appeal scheme will provide significant social and economic benefit to those people living, working, visiting and travelling in and around the Craswell area and the rural surrounds, or which tourists are only one element.

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For the Council to suggest that the Appellant's case **relies** on improved coverage encouraging tourists to utilise the area is another clear example of how the Council continues to not consider **all** of the information put before it. Consequently, their assessment of the proposed scheme and ability to make a full balanced judgement is fundamentally flawed.

Whilst the Council continue to downplay the benefits of the proposed, insisting they haven't been provided with sufficient evidence of the benefits, inspector's at appeal have fully taken into consideration the benefits of the SRN project and the applications for telecommunications radio base stations which are a fundamental part of ensuring this programme is a success.

On 7 March 2024, an inspector fully took into consideration the benefits of a telecommunications site required as part of the SRN project for a site located within the Yorkshire Dales National Park. She noted the significant improvement of coverage across a wide geographic area, the clear public benefits associated with the scheme, the sequential approach taken in a geographically constrained cell search area, constrained further by the confines of the SRN programme for the operators to share one installation thus the operators had to ensure this was feasible for their networks and fill the hole in coverage for the operators in their cell area.

This site was located in Casterton in the Yorkshire Dales National Park. Thus, a location with more national protection than the current appeal site. PINs reference APP/C9499/W/23/3323272 on land at Hoggs Hill. A copy of the PINs decision and the approved plans are attached to this rebuttal letter.

The design is very similar to the current appeal, with the same type of lattice tower (Swann CS5S) and required under the same SRN programme, but 5m shorter. There were also more antennas and transmission dishes as 3 operators need to use this tower in line with the Government requirements in the area. The design of the current appeal mast is such that it is capable of supporting another operator should the other MNOs (Three/EE) require improved service provision in this area in the future.

The Inspector noted that the site was located in an area inherently rural in character, within a very remote, quiet, and tranquil area within the national park where extensive and panoramic views across the wider landscape can be had. This is due to the large areas of open, uninterrupted upland and sweeping fell side with lack of tree coverage and built form nearby with only very few houses and farms in the wider area. The area comprised open access land well used by walkers and other visitors with a network of nearby footpaths and roads (paras 6 and 7 of the Inspector's report).


The allowed appeal is more open than the current appeal location and did not benefit from any tree screening unlike the current appeal site. As the site was located in a National Park, the inspector also had to have regard to the purposes of National Parks as set out in the Environmental Act 1995 as well as para 182 of the Framework which explains that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs. The current appeal is neither in a National Park nor an AONB and thus not so statutorily protected.

The Inspector found, at para 10, that the proposed scheme at Hoggs Hill would '*introduce a highly incongruous, vertical structure within the landscape currently characterised by a distinct lack of built form other than very low level farms and dwellings*'. The Inspector at para 14 '*found that the proposal would not blend into the landscape...it follows that the proposal would fail to conserve the scenic beauty and intrinsic character of the National Park landscape...would also conflict with the first statutory purpose of the National Park*'.

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Yet, despite these findings, the Inspector in carrying out a full balancing exercise found that the significant harm identified was outweighed by the strong benefits of the proposal. Para 15 of the Inspector's report refers to para 118 of the Framework noting that 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 network.

Para 16 of the appeal decision goes on to refer to para 119 of the Framework which supports the number of radio base stations and masts being kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion.

Para 18 of the Inspector's report notes the SRN backed scheme:

*'The scheme is for 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. Supporting information has been provided which notes that the application is to provide increased geographic coverage for three mobile network operators on a single mast. This is to improve 4G connectivity for people living, working, travelling, and visiting the area and to deliver improved digital infrastructure. This area has been identified as a "not spot" and whilst there may be very few people living in the area that would benefit from the installation, it has been stated that the mast will provide links so that users of the landscape can have access to mobile phone connections, leisure apps and mapping information as they pass through. Based on the evidence before me, the installation is required in this part of the National Park to bring much needed coverage to the Casterton area in line with the Government backed SRN programme. A before and after coverage map has been provided that indicates the coverage of the new mast...and would therefore improve coverage significantly across a wide geographic area. Even if there is some alternative network coverage in the area and other masts, it is still not comprehensive coverage with no provision in parts'.*

Para 19 of the Inspector's Report goes on to acknowledge the public benefits and the constrained cell search area:

*'It is clear that there are public benefits associated with provision of enhanced digital communication including benefits to the wider economy, improved connectivity for residents, visitors, businesses, industry, and other sectors, emergency service connection and ensuring continuous coverage. Further, the appellant has followed a sequential approach in relation to their site selection which investigated various siting and design options which are in a geographically constrained cell search area. This is made even more constrained given that this element of the SRN programme is for three operators to share one installation so it requires all three operators to agree that the proposed site location is feasible for their network and will fill the hole in their coverage within the cell area'.*

Para 21 concludes:


*'...on balance, the harm identified would be outweighed by the considerable public benefits...'*

This Inspector's findings are completely transferable to this current appeal. It indicates the Inspector's latest consideration of the SRN programme, which is a Government backed scheme, the constrained cell search area due to the nature of the programme and the acknowledged clear benefits outweighing the harm even in National Parks.

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The Council in its final paragraph prior to the conclusion refers to the Appellant's alternative options and states potential for less sensitive sites have not been considered. Throughout the Appellant's Appeal Statement, it clearly sets out the constrained nature of the search area, such as paras 3.91-3.94. These paragraphs explain the pixel map produced by Ofcom following the submission of the coverage network by each operator. Areas with complete coverage are not allowed to be used under the SRN programme. Total Not Spots are not allowed either. This leaves Partial Not Spots. The search area is constrained further by the operators only being able to locate in a particular partial not spot area where each of the two operators have no existing coverage. The location of the site has to be agreed by both operators as well as Ofcom. Thus, the search area is naturally far more restricted and complicated with multiple layers of prohibitions.

Para 3.13 of the Appellant's Appeal Statement demonstrates the general search area for the site. Figure 3.1 attached to the end of the LVIA in the Appellant's Appeal Statement shows the landscape context. Approximately two thirds of the search area is in the Brecon Beacons National Park. Following the sequential approach avoiding National Parks should be adhered to wherever possible. The appellant in choosing the appeal site location has followed this approach. Furthermore, if one looks at the contour lines shown in Figure 3.1 at the end of the LVIA it is clear that the land steeply rises. The appellant's build team confirmed that the 2 discounts in the Brecon Beacons National Park set out in the discounts section of the Supplementary Information Statement submitted with the application documents and also included in the Appellant's Appeal Statement would also not be buildable due to the lack of access caused by the steep terrain. The same reasons apply to the rest of the land in the National Park which is in the Appellant's search area. The steeply rising land would prevent access to the site and sites cannot be built on a slope. To the south of the appeal site (outside the National Park) the land is boggy and rising (LCA High Moors and Commons) giving way to streams further south and then steeply rising ground (LCA High Hills and Slopes). This land is also not able to be built on due to the steep terrain, the boggy nature and the streams in the area. To the south east the land levels fall away and would not be able to provide the necessary coverage to the target coverage area and thus would fail the design brief. The discount at D3 of the Appellant's Appeal Statement indicates this to be the case.

The appeal site is not in a National Park, nor an AONB and not in a SAC. These designated areas are also not nearby. The site has also been carefully sited to be outside the SSSI. Any location further south would be within the SSSI. Locating further south would also be more prominent given the rising land (High Moors and Commons or High Hills and Slopes). Any location further north would be outside the search area. Thus, as set out in the Appellant's Appeal Statement this site is the only suitable option within the operators search area and which would provide the necessary coverage to the target coverage area.

The appellant confirms that the suggested conditions by the LPA are acceptable, should the Inspector be minded to allow the appeal.


Turning to the third party representations submitted to the planning inspectorate. Comments have been made that the proposed scheme would provide limited shared access. This site is for 2 out of the 4 main MNSs accounting for approximately 53% of the UK mobile network coverage. These operators rent network space to a further 8 MVNOs – VOXI, ASDA Mobile, Lebara Mobile, Talk Mobile, GiffGaff, Sky Mobile, Tesco Mobile and Virgin Mobile. Thus, the appellant does not agree that the proposal would provide limited shared access.

Concerns have also been raised regarding the impact of the appeal scheme on Hay Bluff CatsBack, the foothills of the Black Mountains and Offa's Dyke path. The LVIA, the LVIA Addendum, the Appellant's

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Appeal Statement and earlier in this rebuttal all set out that the impact on these locations would be minor adverse on these high sensitivity receptors.

The Addendum to the LVIA submitted with the Appellant's Appeal Statement notes that this is a large-scale landscape, and the site is located at the base of the slopes of Black Mountain. Situated at 475m Above Ordnance Datum (AOD) the site is dwarfed by the adjacent hillside which reaches 677m AOD only 1.2km south west of the site (para 8 of the Addendum to the LVIA). The development would not be visible from the highest ground in the area, Black Mountain.

Para 11 of the Addendum to the LVIA makes reference to visibility from popular footpaths including Offa's Dyke (the scheme would not affect the underlying nature of the view experienced by walkers), from other designated trails such as Three Rivers Ride there would be low visibility of the proposed mast, Viewpoint 3 (see Appendix 19 of the Appellant's Appeal Statement, which was also submitted with the original planning application documents), is representative of the closest right of way to the site at some 0.2km north of the site and the LVIA acknowledges this as having moderate to minor effect. From these low-lying routes, the proposed mast would have its lower extents screened by adjacent woodland, and the top extent would be set against the backdrop of the valley side, limiting its visibility due to the effect of back clothing.

As set out in para 15 of the LVIA Addendum the siting is suitable from a landscape and visual perspective with potential effects limited due to its position at the base of the slope, limiting the perceived scale of the mast in views from the north west, north and east, the presence of a shelter belt of woodland directly adjacent screens the base of the mast in most views. A significant portion of views of the mast would include back-clothing of the mast by the landscape, with the mast often lost against the dark backdrop of the valley form.


Concerns have been raised regarding the generator and the potential for diesel spills and noise. As set out in the Appellant's Appeal Statement at para 7.3 the generator proposed uses bio-fuel as its energy source. This fuel is a Hydrotreated Vegetable Oil (HVO), an environmentally-friendly diesel alternative. To ensure no risk of environmental damage and to minimise noise emissions during its potential periods of operation (during power outages), it is triple bundled to prevent fuel leaks and minimise noise. Para 7.4 of the Appellant's Appeal Statement advises that the tank would be refuelled when needed via an All-Wheel Drive vehicle which are reliable in adverse weather conditions. Two trips would be needed to fully refuel the tank. As the generator would only be needed in times of power outage then refuelling would take place sporadically rather than routinely.

Objectors suggest that two or more smaller transmitters nearer power lines would achieve the same level of mobile coverage, without the noise or impact on the landscape. As already explained earlier in this rebuttal and in the Appellant's Appeal Statement, the siting of the radio base station is extremely constrained due to the nature of the programme and the target coverage areas required to be covered by Ofcom and the operators themselves. Smaller structures would not be able to support the equipment for the main MNOs and the programme requires the equipment/structure to be shared. Applying a domestic external aerial for one property cannot be compared to the requirements for two of the four main MNOs. It is wholly unrealistic as they have to cover a much larger area. NPPF requires the installation of a minimum number of masts in the area, thus installing several masts would lead to proliferation contrary to the Framework as well as having a greater impact on the landscape. It is also worthy to note that the operators seek to site their radio base stations as near as possible to power lines to avoid off grid solutions. The only reason the generator is being proposed is to build resilience into the site such that if there was a power cut then service would not be affected as the generator would continue

**In the first instance, all correspondence should be directed to the agent.**

Cornerstone

Registered Address:  
Cornerstone Telecommunications, Infrastructure Limited,  
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.  
Registered in England & Wales No. 08087551.  
VAT No. GB142 8555 06

 Cornerstone, Hive 2,  
1530 Arlington Business Park,  
Theale, Berkshire, RG7 4SA

to provide the necessary power to the site until the national grid power came back online. This site will be powered by the regional electricity company for most of the time, except during power outages.

A third party representation has suggested that emergency services such as Mountain Rescue have mobile masts if they are in locations with little signal. The appellant wishes to point out that Mountain Rescue are not Mobile Network Operators and do not install radio base stations where there is a lack of coverage. They are not code system operators and do not have the rights to install their own masts. They are reliant on the Mobile Network Operators installing a radio base station in their area in order for their handheld devices to work, for 4G drones to be used to track missing persons or 4G tracking devices on mountain rescue dogs to find persons in these hard to reach rural areas and so on.

Air Ambulance charities have advised the appellant that they rely on a mobile signal as it is vital for those first on scene to contact the emergency services. The Air Ambulance crews often use a mobile data-enabled network which allows access to an ACANS (Aircraft Command And Navigation System), this ensures that time critical missions are completed more efficiently whilst helping to keep the crew safe and informed. See attached letter from Cornwall Air Ambulance to the appellant, advising how mobile coverage is pertinent to their ability to save lives.

I trust that the above comments will be taken into consideration in the determination of this appeal together with the Appellant's Appeal Statement including the LVIA and LVIA Addendum.

If you have any queries, please do not hesitate to contact me.

Yours faithfully



Jennie Hann BSc MTPI MRTPI  
Planning Manager  
Clarke Telecom Ltd

Tel:

Fax:

Email

(for and on behalf of Cornerstone)

Enc PINs Decision Notice Hoggs Hill APP/C9499/W/23/3323272 and approved plans


Letter from Cornwall Air Ambulance to appellant

**In the first instance, all correspondence should be directed to the agent.**

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 Cornerstone, Hive 2,  
1530 Arlington Business Park,  
Theale, Berkshire, RG7 4SA



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# Appeal Decision

Site visit made on 13 February 2024

**by N Teasdale BA (Hons) DipTP MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 7 March 2024**

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**Appeal Ref: APP/C9499/W/23/3323272**

**Land at Hoggs Hill, Barbon Low Fell, off Fell Road, Casterton, Carnforth, Cumbria, LA6 2JP**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant full planning permission.
  - The appeal is made by Cornerstone against the decision of Yorkshire Dales National Park Authority.
  - The application Ref S/05/49, dated 7 June 2022, was refused by notice dated 2 December 2022.
  - The development proposed is installation of a 25m lattice tower supporting 6 no. antennas, 4 no. transmission dishes, 2 no. equipment cabinets, 1 no. meter cabinet and ancillary development thereto including a generator and associated fuel tank, fenced compound, hard standing, and an access track for the shared rural network project on behalf of Cornerstone.
- 

## Decision

1. The appeal is allowed and planning permission is granted for installation of a 25m lattice tower supporting 6 no. antennas, 4 no. transmission dishes, 2 no. equipment cabinets, 1 no. meter cabinet and ancillary development thereto including a generator and associated fuel tank, fenced compound and hard standing for the shared rural network project on behalf of Cornerstone on land at Hoggs Hill, Barbon Low Fell, off Fell Road, Casterton, Carnforth, Cumbria LA6 2JP in accordance with the terms of the application, Ref S/05/49, dated 7 June 2022, subject to the conditions set out on the attached schedule.

## Procedural Matters

2. A screening direction was issued under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). In exercise of the powers conferred by Regulation 14 (1) and 7 (5) of the EIA Regulations, the Secretary of State directed that the development is not EIA development.
3. An update to the National Planning Policy Framework (the Framework) has been published dated 19 December 2023 but there are no material changes relevant to the substance of the appeal.
4. During the course of the application, the proposed access track was removed from the scheme and the access track does not therefore form part of the development subject to this appeal. As such, I have omitted reference to the access track in the terms of my decision.

## **Main Issue**

5. The main issue is the effect of the proposed development on the scenic beauty and intrinsic character of the National Park landscape.

## **Reasons**

6. The appeal site is located at Hoggs Hill, Barbon Low Fell, Casterton within the National Park landscape. It is accessed from Fell Road to the south which is a single-track lane with the site sitting approximately 570 metres to the north of this lane. Access is gained by walking up a steep uneven terrain to the site which is at the junction of two dry stone walls at a high point. The surrounding area is inherently rural in character, comprising moorland fells, rough grass, bracken, and wet rushes. It is located within a very remote, quiet, and tranquil area within the National Park where extensive and panoramic views across the wider landscape can be had. This is due to the large areas of open, uninterrupted upland and sweeping fell sides with lack of tree coverage and built form nearby with only very few houses and farms in the wider area. Such houses and farms generally sit at low level and are well established in the landscape owing to their age and vernacular style and thus sit relatively quietly within this setting. A number of electricity cables on timber poles run across the hillside but are not dominant/notable features largely due to them running along the hillside at a much lower height and thus not sky lined and are set against the backdrop of the hills which helps to screen the cables. There are no overtly vertical features within the landscape.
7. The area comprises open access land which is available for all to walk on and at the time of my site visit whilst only a snapshot in time, I observed that the surrounding area was well used by walkers and other visitors with a network of nearby public footpaths and roads.
8. In considering the proposal, I have had regard to the purposes of National Parks as set out in the Environmental Act, 1995 as well as paragraph 182 of the Framework which explains that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty.
9. The proposed development seeks permission for the installation of a 25m lattice tower mast with 6 x antennas and 4 x transmission dishes on it. Two equipment cabinets, 1 meter cabinet and other ancillary development including a generator and associated fuel tank to be sited in the compound. The compound would be bound by a dry-stone wall and an area of external hardstanding is proposed to the east of the compound.
10. Whilst the tower would not be visible in close views from Fell Road given the topography of the land. It would be visible including glimpsed views from the open access land around it and from the nearby public footpath and ridges within the area. The proposed lattice design, height, and location up the steep terrain would also result in it being visible from longer range views in this part of the National Park where there are clear views of the fells. It would therefore introduce a highly incongruous, vertical structure within the landscape currently characterised by a distinct lack of built form other than very low-level farms and dwellings.



11. As set out, there are other vertical man-made elements in the area in the form of electricity cables on timber poles crossing the landscape. However, these are not of the same height or design as the proposed tower, which would be more prominent.
12. A Landscape and Visual Impact Assessment has been undertaken which establishes an area of influence of the site and surrounding landscape likely to be affected by the proposed development. It assesses the landscape characteristics, views of the site from the surrounding areas, the location and sensitivity of visual receptors and the potential landscape and visual effects arising from the development. Within the scoping process, the key viewpoints that impacted the highest number of highly sensitive receptors were assessed taking into account the Guidelines for Landscape and Visual Impact Assessment Third Edition prepared by The Landscape Institute and Institute of Environmental Management and Assessment. I have no reason to question the overall methodology carried out or any substantive evidence to the contrary. Six viewpoints were identified with visual photomontages included which I have had due regard to. Following the assessment of sensitivity and magnitude, the overall effect has been established. It concludes that 2 out of the 6 viewpoints, the mast results in a moderate effect with the others identified as neutral.
13. Notwithstanding, the lattice tower would still have a clear visual impact, contrasting with the prevailing character of the National Park landscape. Despite the 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, thereby being incongruous in the National Park landscape. The greatest changes relate to receptors closest to the site at viewpoint 1 identified as having a moderate effect. The backdrop against a number of undulating hills would help to mitigate some of the visual effect of the proposal so that a large proportion of the tower would not be seen in the context of the open sky and where such views are had, its recessive colour would help it to blend in with an often grey sky. A new stone wall is also proposed to help screen the cabinets and base of the mast. In terms of viewpoint 3 also identified as having a moderate effect, only the top of the tower would be partially visible given the existing steep topography of the land. The base of the mast or cabinet would not be visible. This would go some way to help its overall visual impact but would not be sufficient to enable me to conclude that it would not have a negative visual impact in this sensitive setting.
14. Given that I have found that the proposal would not blend into the landscape despite the above factors, it follows that the proposal would fail to conserve the scenic beauty and intrinsic character of the National Park landscape. I therefore find that the proposed development would conflict with Policy S28 of the South Lakeland Local Plan, 2006 and Policies CS7.4, CS8.1 and CS8.2 of the South Lakeland Local Development Framework Core Strategy, 2010 which together, amongst other matters, seek to protect and enhance landscape and settlement character requiring proposed masts and equipment to not be unduly prominent in the landscape. For the same reasons, the proposed development would also conflict with the first statutory purpose of the National Park (Environment Act 1995) and paragraph 182 of the Framework which together, amongst other matters, explains that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads, and Areas of Outstanding Natural Beauty.

## Planning Balance

15. Paragraph 118 of the Framework explains that 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).
16. Paragraph 119 explains 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.
17. Paragraph 121 goes on to explain that applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development.
18. The scheme is for 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. Supporting information has been provided which notes that the application is to provide increased geographic coverage for three mobile network operators on a single mast. This is to improve 4G connectivity for people living, working, travelling, and visiting the area and to deliver improved digital infrastructure. This area has been identified as a "not spot" and whilst there may be very few people living in the area that would benefit from the installation, it has been stated that the mast will provide links so that users of the landscape can have access to mobile phone connections, leisure apps and mapping information as they pass through. Based on the evidence before me, the installation is required in this part of the National Park to bring much needed coverage to the Casterton area in line with the Government backed SRN programme. A before and after coverage map has been provided that indicates that the coverage of the new mast would include areas of Barbondale and around Bull Pot Farm and areas of Casterton Fell and some parts of the wider Lune Valley and would therefore improve coverage significantly across a wide geographic area. Even if there is some alternative network coverage in the area and other masts, it is still not comprehensive coverage with no provision in parts. I also cannot be certain that such areas are infrequently used by traffic and visitors particularly given my observations onsite and in busy visitor periods/certain times of the year given the natural beauty of the National Park and open access of the land which ultimately attracts visitors.
19. It is clear that there are public benefits associated with provision of enhanced digital communication including benefits to the wider economy, improved

connectivity for residents, visitors, businesses, industry, and other sectors, emergency service connection and ensuring continuous coverage. Further, the appellant has followed a sequential approach in relation to their site selection which investigated various siting and design options which are in a geographically constrained cell search area. This is made even more constrained given that this element of the SRN programme is for three operators to share one installation so it requires all three operators to agree that the proposed site location is feasible for their network and will fill the hole in their coverage within the cell area.

20. I have had regard to the specific requirements for such telecommunications and location of the alternative sites explored by the appellant and the explanation on why these were discounted. The appellant has provided adequate justification for discounting other sites including matters relating to insufficient coverage, viability, physical access constraints and unstable ground conditions. I am also aware that it is not possible to site the equipment outside the National Park because the whole of the cell area is located within it. Based on the evidence before me, I am satisfied that other alternative siting solutions have been adequately explored by the appellant and have been found to have been unsuitable for the proposal and that the site in question is the only suitable option within the operators search area which would provide the necessary coverage to the target coverage area. Furthermore, there is no counter evidence before me which would lead me to come to a different conclusion.
21. I am fully aware that the Framework requires that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks. However, on balance, the harm identified would be outweighed by the considerable public benefits. Consequently, this material consideration outweighs the conflict with the development plan in the particular circumstances of this case.

### **Other Matters**

22. I am aware that a previously proposed track has been omitted from the scheme and as such, the whole build would therefore be carried out by helicopter with all materials, equipment and staff being transferred to the site by helicopter. I am aware of the concerns raised in this regard relating to matters of noise and disturbance. However, details relating to this are limited and I cannot therefore conclude with certainty that the scheme would have an unacceptable adverse impact in this regard. Given that any noise and disturbance associated with the use of the helicopter would be during the construction period only and therefore not long term or permanent then I am satisfied that the proposed development would not result in an unacceptable level of harm in this regard. Further, a condition requiring a Construction Environmental Management Plan to be submitted would ensure the environmental sustainability of the proposed development during the construction phase which I have applied. Any other likely noise sources associated with the scheme such as generators etc would be unlikely to be heard from residents living in the area given the separation distances involved and topography of the land. Visitors to the area are also unlikely to be unduly harmed by any potential other noise sources given the overall nature of the open access where movement across the land takes place opposed to stationary movements including at distances away from the site.

23. I have no compelling case to suggest that the proposed development would unacceptably affect local water supplies, Sites of Specific Scientific Interest or flora and fauna. There is also no compelling case to suggest that the proposed development would have a detrimental impact on highway safety particularly given that the previously proposed track has been omitted from the scheme. Reference has also been made to previously refused schemes. However, I have determined this appeal based on its own merits. Matters relating to financial gain has not affected my findings.

### **Conditions**

24. I have considered the Council's suggested planning conditions in light of the Framework and Planning Practice Guidance. As a result, I have amended these where necessary for clarity. The standard time for commencement of development is necessary as well as a plans condition in the interests of certainty. A condition relating to a Construction Environmental Management Plan is necessary to ensure the environmental sustainability of the proposed development during the construction phase. Conditions relating to materials and enclosure of a drystone wall is necessary to preserve the character of the National Park landscape. A condition relating to the removal of the equipment when they cease use is necessary in the interests of visual amenity.

### **Conclusion**

25. For the above reasons, the material considerations indicate that this decision should be made otherwise than in accordance with the development plan. I therefore conclude that the appeal is allowed.

*N Teasdale*

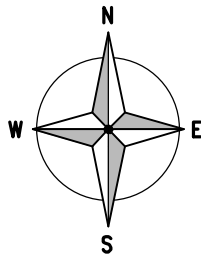
INSPECTOR

### **SCHEDULE OF CONDITIONS**

- 1) The development must be begun within three years from the date of this permission.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Map Drawing No. 100 Rev C; Detailed Site Location Map Drawing No. 101 Rev C; Proposed Site Plan Drawing No. 201 Revision D; Proposed Site Elevation Drawing No 301 Rev C.
- 3) Prior to the commencement of any works a Construction Environmental Management Plan shall be submitted to and approved in writing by the Local Planning Authority.
- 4) Prior to the first use of the equipment hereby approved, the lattice tower shall be a galvanized colour, any antenna, dishes, and any other associated equipment mounted to the mast shall be finished in the colour RAL 7035 – Light grey, any ground mounted equipment shall be finished in RAL 6022 – Olive Drab and they shall all be maintained as such thereafter.
- 5) Prior to the first use of the mast and associated equipment hereby approved, the compound shall be enclosed with a drystone wall constructed from limestone to match in style nearby walls, to a minimum height of 1.5 metres, as indicated on Proposed Site Plan (drawing no. 201D) and shall be retained as such thereafter.
- 6) When the lattice tower and associated antenna, dishes, equipment cabinets and any other associated equipment, the subject of this permission, cease to be used for the purpose for which they were installed, they shall be removed from the site and the ground made good as soon as is reasonably practical.

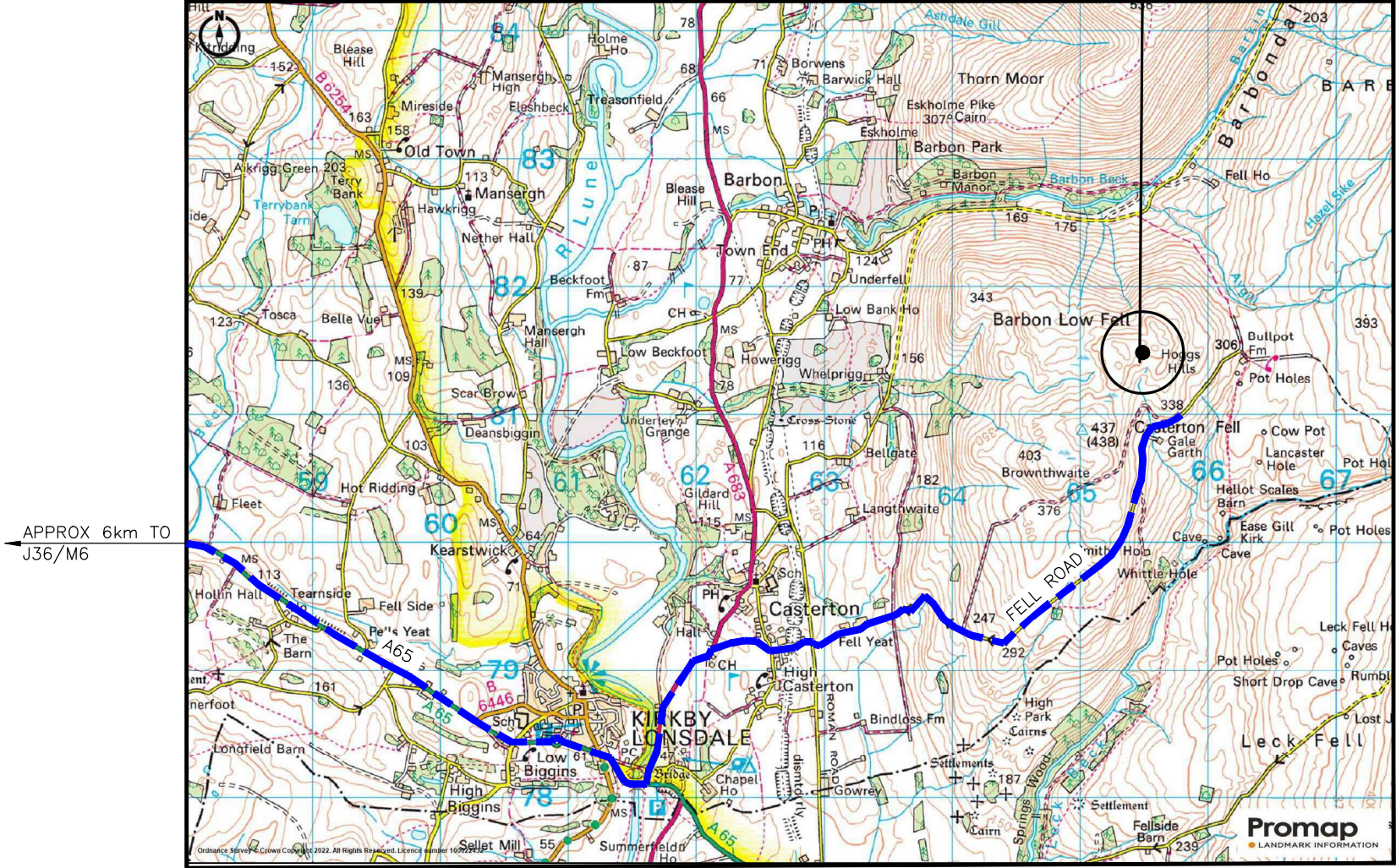
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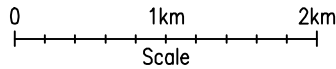
= Right of Access

= Public Access Route



APPROX 6km TO  
J36/M6

SITE LOCATION



**SITE LOCATION**  
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SITE PHOTOGRAPH

The drawings comply with TEF & Vodafone Standard ICNIRP guidelines.  
Designed in accordance with CORNERSTONE document: SDN0142

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R | E: 365470 N: 481492

DIRECTIONS TO SITE:  
HEAD NORTH ON THE M6 AT JUNCTION 36,  
TAKE THE 3RD EXIT ONTO A590/A65.  
FOLLOW A65 TOWARDS KIRKBY LONSDALE FOR  
APPROX 11km. AT SIGN POST FOR FELL VIEW  
PARK TURN LEFT ONTO LONG LEVEL.  
CONTINUE ONTO WANDALES LANE FOR  
APPROX 1.2km. TAKE A SHARP RIGHT ONTO  
FELL ROAD. FOLLOW FELL ROAD FOR APPROX  
4km TO FIELD ACCESS GATE ON THE LEFT.  
PROPOSED SITE IS AT TOP OF THE FIELD  
(APPROX 600m). PEDESTRIAN ACCESS FROM  
THIS POINT ONLY FOR MAINTENANCE TEAMS  
DUE TO STEEP GRADIENT OF HILLSIDE. SITE  
IS HELICOPTER BUILD ONLY.

NOTES:

REV	MODIFICATION	BY	CH	DATE
C	Access Track Amendment	CMB	AB	07.09.22
B	Three ID Updated/lower Updated	KS	JC	25.02.22
A-001	Issued for Approval	AMW	A.W	28.01.22

CLARKE  
telecom

Unit E, Madison Place, Northampton Road,  
Manchester, M40 5AG  
Tel: 0161 785 4500  
Fax: 0161 785 4501  
Web: www.clarke-telecom.com

cornerstone

CORNERSTONE - SRN

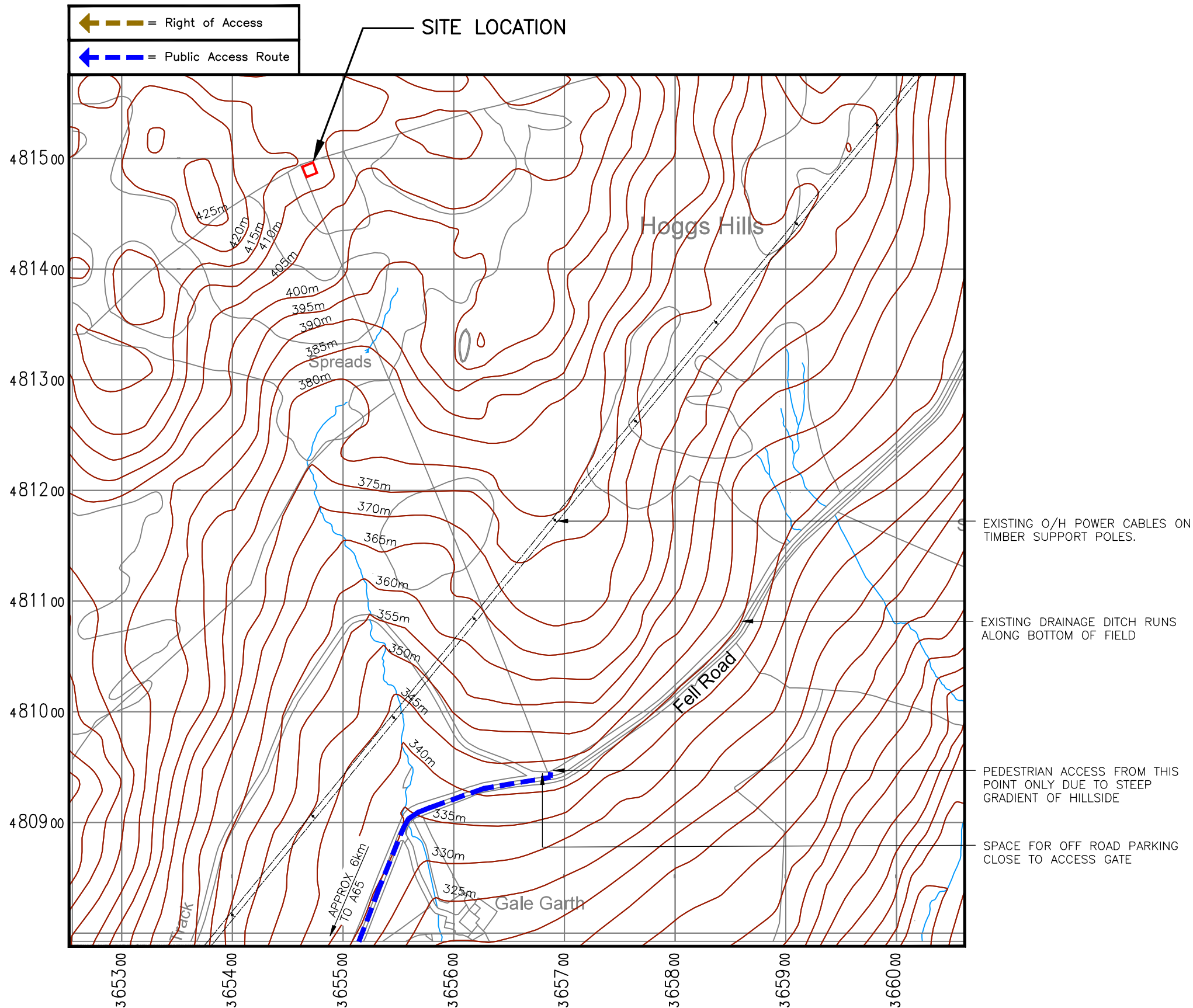
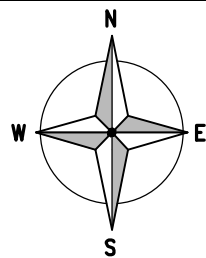
Cell Name	Opt.
BARBON LOW FELL	-

Cell ID No		
CS ID	TEF	VF
30538500	-	20535
CS E REF	THREE	TRIDENT
E367459	LA0292	8508305

Site Address / Contact Details		
FELL ROAD CASTERTON CARNFORTH CUMBRIA LA6 2JP		

Drawing Title: SITE LOCATION MAP				
Purpose of issue: PLANNING				Dwg Rev:
Drawing Number: 100				C
Surveyed By: CL		Original Sheet Size: A3		Pack Issue:
Drawn: AMW	Date: 28.01.22	Checked: A.W	Date: 28.01.22	D





### DETAILED SITE LOCATION

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<p>DIRECTIONS TO SITE: HEAD NORTH ON THE M6 AT JUNCTION 36, TAKE THE 3RD EXIT ONTO A590/A65. FOLLOW A65 TOWARDS KIRKBY LONSDALE FOR APPROX 11km. AT SIGN POST FOR FELL VIEW PARK TURN LEFT ONTO LONG LEVEL. CONTINUE ONTO WANDALES LANE FOR APPROX 1.2km. TAKE A SHARP RIGHT ONTO FELL ROAD. FOLLOW FELL ROAD FOR APPROX 4km TO FILED ACCESS GATE ON THE LEFT. PROPOSED SITE IS AT TOP OF THE FIELD (APPROX 600m). PEDESTRIAN ACCESS FROM THIS POINT ONLY FOR MAINTENANCE TEAMS DUE TO STEEP GRADIENT OF HILLSIDE. SITE IS HELICOPTER BUILD ONLY.</p>					
<p>NOTES:</p>					
D	Access Track Amendment	CMB	AB	07.09.22	
C	Access Track Updated	KS	NB	31.05.22	
B	Three ID Updated/Tower Updated	KS	JG	25.02.22	
A	First Issue	AMW	AW	28.01.22	
REV	MODIFICATION	BY	CH	DATE	



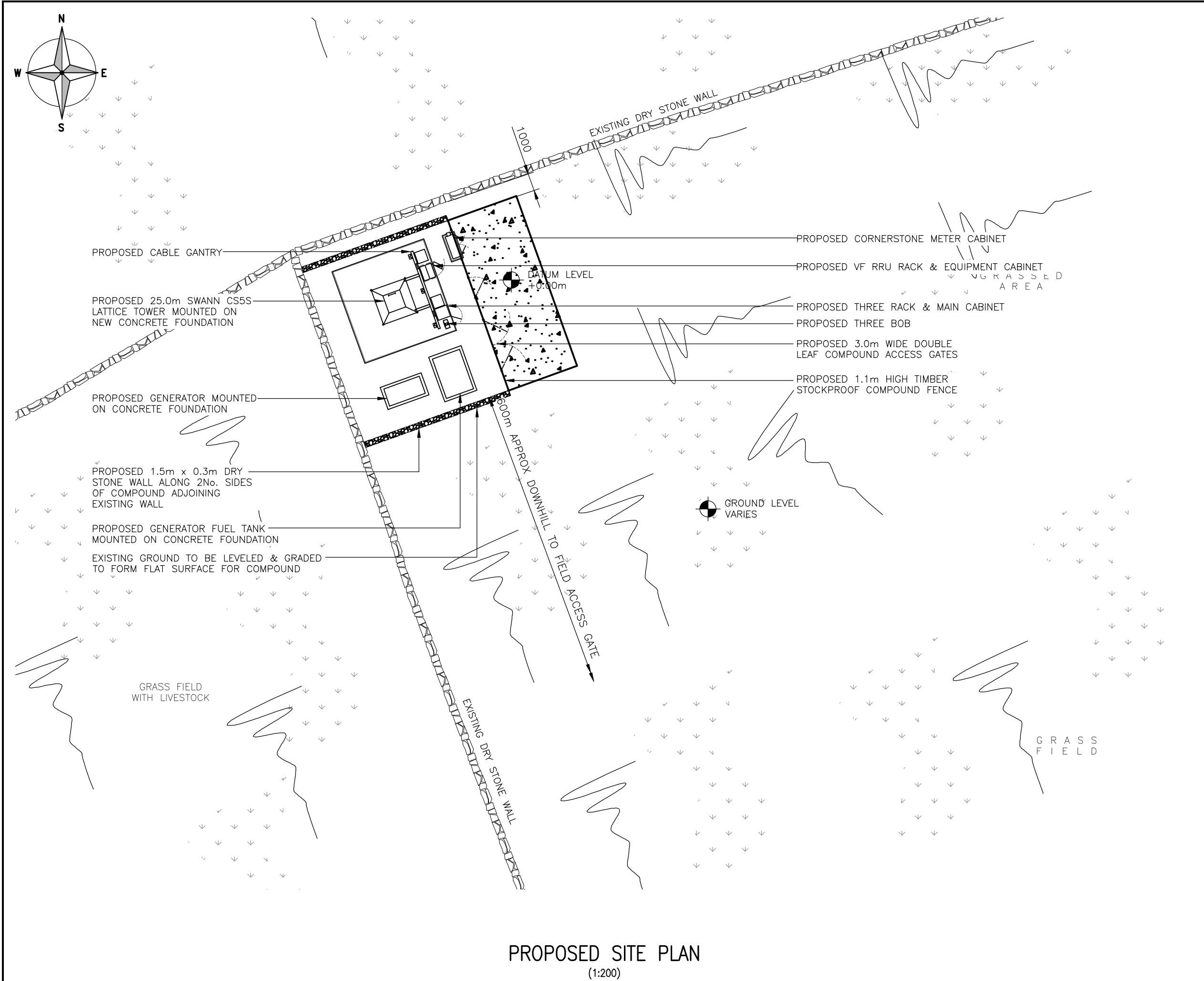
Unit E, Madison Place, Northampton Road,  
Manchester, M40 5AG  
Tel: 0161 785 4500  
Fax: 0161 785 4501  
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CORNERSTONE - SRN

Cell Name		Opt.
BARBON LOW FELL		—
Cell ID No		
CS ID	TEF	VF
30538500	—	20535
CS E REF	THREE	TRIDENT
E367459	LA0292	8508305
Site Address / Contact Details		
FELL ROAD CASTERTON CARNFORTH CUMBRIA LA6 2JP		
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Purpose of issue:		Dwg Rev:
PLANNING		
Drawing Number:		C
101		
Surveyed By:		Pack Issue:
CL		
Original Sheet Size:		
A3		
Drawn:	Date:	Checked:
AMW	28.01.22	AW
		Date:
		28.01.22
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E: 365470 N: 481492

NOTES:

D	Access Track & Fence Updated	CMB	AB	07.09.22
C	Access Track & Fence Updated	KS	NB	31.05.22
B	Three ID Updated/Tower Updated	KS	JC	25.02.22
A	First Issue	AMW	AW	28.01.22
REV	MODIFICATION	BY	CH	DATE

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CORNERSTONE - SRN

Cell Name

Opt.

BARBON LOW FELL

-

Cell ID No

CS ID

TEF

VF

30538500

-

20535

CS E REF

THREE

TRIDENT

E367459

LA0292

8508305

Site Address / Contact Details

FELL ROAD  
CASTERTON  
CARNFORTH  
CUMBRIA  
LA6 2JP

Drawing Title:

PROPOSED SITE PLAN

Purpose of issue:

PLANNING

Dwg Rev:

Drawing Number:

201

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Surveyed By:

CL

Original Sheet Size:

A3

Pack Issue:

Drawn:

AMW

Date:

28.01.22

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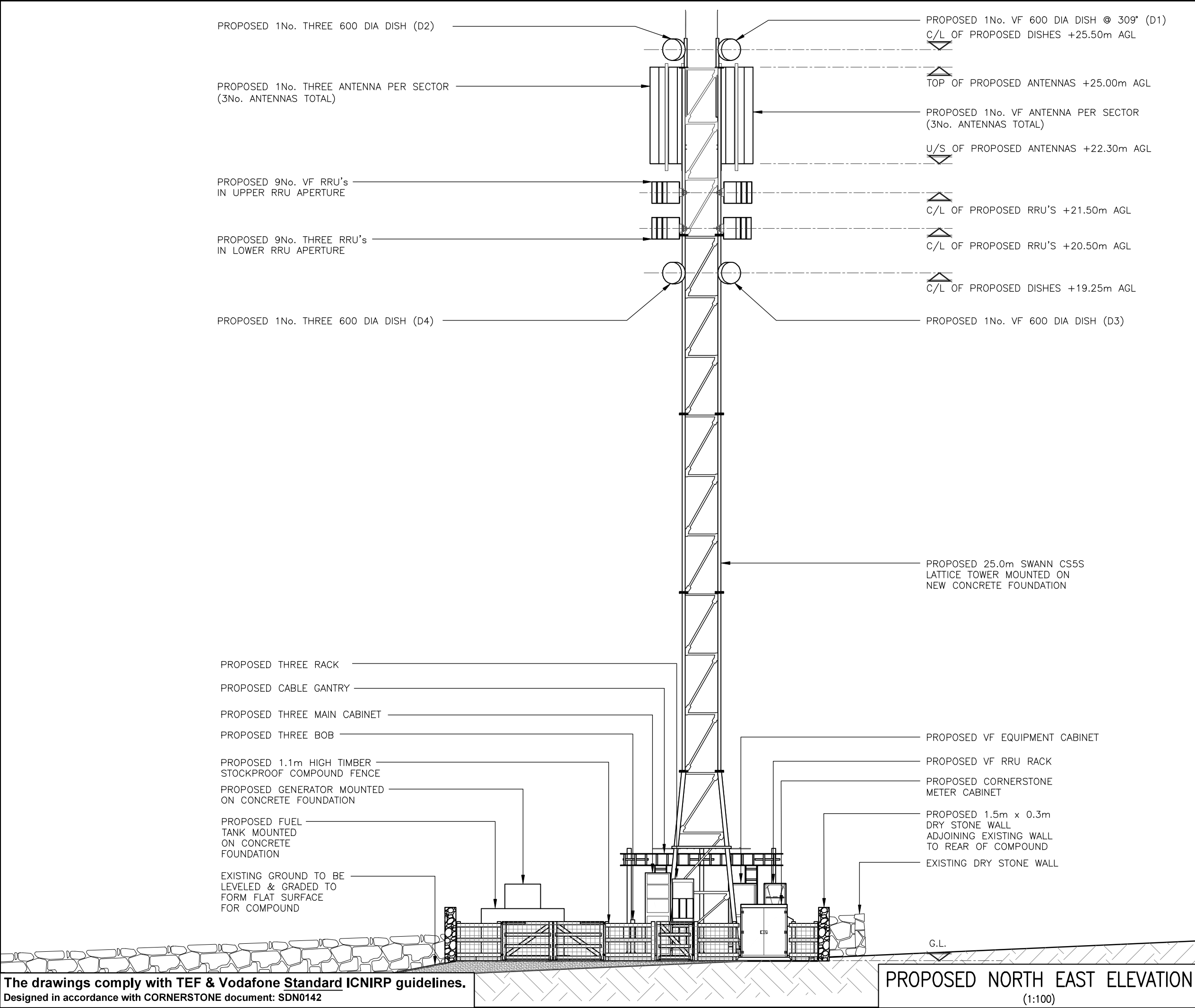
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Date:

28.01.22

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CORNERSTONE - SRN

Cell Name		Opt.
BARBON LOW FELL		—
Cell ID No		
CS ID	TEF	VF
30538500	—	20535
CS E REF	THREE	TRIDENT
E367459	LA0292	8508305
Site Address / Contact Details		
FELL ROAD CASTERTON CARNFORTH CUMBRIA LA6 2JP		
Drawing Title: PROPOSED SITE ELEVATION		
Purpose of issue: PLANNING		Dwg Rev:
Drawing Number: 301		C
Surveyed By: CL		Original Sheet Size: A3
Drawn: AMW	Date: 28.01.22	Checked: AW
	Date: 28.01.22	Pack Issue: D

8th March 2024

To whom it may concern,

### **Shared Rural Network Programme**

Cornwall Air Ambulance are a local Cornish charity providing critical care to the seriously sick and injured people across Cornwall and the Isles of Scilly. Responding to over 1,000 missions annually, our crew can respond at a critical time when every second matters.

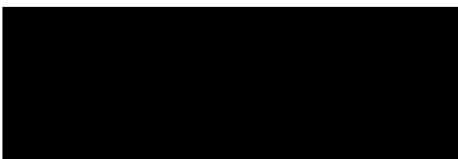
Our charity has seen a 10% rise in mission numbers over the last year, after being tasked 1,160 times during 2023. We operate with no direct government support towards running costs, we therefore rely on the generosity of our community to enable our highly skilled crew and specialist equipment to respond to major incidents, convey patients to the best-situated hospital and to keep us flying 365 days a year. Following discussions with Cornerstone, we understand there is a potential SRN site in Bodmin. Within this location and surrounding area we were tasked to 73 missions in 2023.

There are a number of isolated populations throughout Cornwall and our road infrastructure can become very congested in the summer months. Therefore, some major incidents can only be reached and transferred, in time, by air ambulance.

In critical conditions where Cornwall Air Ambulance are tasked, a mobile signal is vital for those first on scene to contact emergency services. Our crew also use a mobile data-enabled network which allows access to an ACANS (Aircraft Command And Navigation System), this ensures that time critical missions are completed more efficiently whilst helping to keep the crew safe and informed.

Cornwall Air Ambulance are, therefore, supportive of the progressive initiative of the Shared Rural Network (SRN) programme that will extend 4G mobile coverage across Cornwall and can foresee the benefits of prosperity and accessible services that a 4G network will bring to the local community and our Charity.

Yours faithfully,



Tim Bunting  
Chief Executive Officer