



Snowdonia National Park Authority
Supplementary Planning Guidance
Telecommunications and Masts
(Adopted version)
September 2021

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SNOWDONIA NATIONAL PARK AUTHORITY



SUPPLEMENTARY PLANNING GUIDANCE: TELECOMMUNICATIONS AND MASTS

National Park Purposes and Responsibilities

Environment Act 1995

61. Purposes of National Parks.

The provisions of this Part of this Act shall have effect for the purpose -

(a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and

(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

Planning Policy Wales: Edition 10 – December 2018

6.3.6 In National Parks, planning authorities should give great weight to the statutory purposes of National Parks, which are to conserve and enhance their natural beauty, wildlife and cultural heritage, and to promote opportunities for public understanding and enjoyment of their special qualities. Planning authorities should also seek to foster the social, economic and cultural well-being of their local communities.

6.3.9 The special qualities of designated areas should be given weight in the development planning and the development management process. Proposals in National Parks and AONBs must be carefully assessed to ensure that their effects on those features which the designation is intended to protect are acceptable. The contribution that development makes to the sustainable management of the designated area must be considered.

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act is about improving the social, economic, environmental and cultural Well-being of Wales. It establishes a 'sustainable development principle' which means that a defined public body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. The Act puts in place seven well-being goals:

- *A globally responsible Wales*
- *A prosperous Wales*
- *A resilient Wales*
- *A healthier Wales*
- *A more equal Wales*
- *A Wales of cohesive communities*
- *A Wales of vibrant culture and thriving Welsh Language*

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1. Introduction

- 1.1 This guidance note is one of a series of Supplementary Planning Guidance (SPG) documents which provides further detailed information on how policies contained in the Eryri Local Development Plan (ELDP) (2016-2031) will be applied in practice by the National Park Authority. The Supplementary Planning Guidance is intended to give more detail on specific issues than is possible or appropriate in the ELDP

Purpose

- 1.2 The purpose of this Supplementary Planning Guidance is:
- To provide detailed guidance about the manner in which the Planning Authority will deal with telecommunication and mast developments which may have an effect on the landscape and character of Eryri.
 - To provide guidance to assist developers submitting planning and prior approval applications, and to planning officers and Park Authority members in determining planning applications.

Status

- 1.3 This Supplementary Planning Guidance (SPG) will be a material planning consideration when decisions are made on planning applications.
- 1.4 This SPG has been produced to support the policies within the ELDP.
- 1.5 In accordance with good practice, applicants are encouraged to discuss applications with officers, beforehand, in order to decide what kind of assessments need to be prepared. More detail on this is included on the following page.
- 1.6 The most relevant policies in the ELDP are:

- **Development Policy 26: Telecommunication (26)**
- **Development Policy 1: General Development Principles (1)**
- **Development Policy 2: Development and the Landscape (2)**
- **Strategic Policy A: National Park Purposes and Sustainable Development (A)**
- **Strategic Policy D: Natural Environment (D)**

- 1.7 Additional documents relevant to this SPG are:

- **SPG 7: Landscapes and Seascapes of Eryri**
- **SPG 13: Landscape Sensitivity and Capacity Assessment**

Pre application advice

- 1.8 Prior to submitting a full application, applicants and developers may wish to contact the Planning Service at the National Park Authority, and to work with officers at the pre-application stage, where planning advice is given prior to the submission of a formal planning and/or prior approval application.
- 1.9 Pre application advice has many advantages with telecommunications developments, and micro-siting issues are easily addressed prior to the formal submission of an application.
- 1.10 To access the service applicants will need to complete and submit a pre-application enquiry form (found on the Authority's website) and provide information such as:
- A description of the proposal and what kind of planning permission is being sought
 - A location plan and any other drawings/plans or sketch details you have available
 - The current use of the site or building
 - Photographs of the site or building and of the surrounding area
 - Assessment of potential alternative sites – which will give officers opportunities to assess the landscape and visual impact on different sites
 - Preliminary landscape and visual impacts assessments taking into account the relevant SPG's
 - Any other relevant information (e.g. ecological surveys)
- 1.11 A charge is payable for the pre-application service. The fee varies depending on the type and scale of the proposed development. The following is a link to the relevant page on the Snowdonia National Park website which details this service - <https://www.snowdonia.gov.wales/planning/planning-permission/pre-application-enquiry>
- 1.12 It is also advised that applicants have early discussions with statutory consultees such as NRW and Highways Departments. These discussions between applicant and statutory consultees may assist with the pre-application submission.
- 1.13 Following the submission of this form the applicant will receive a written response from the Authority (normally within 21 days).

General Context

- 1.14 There are pressures relating to telecommunications infrastructure within Snowdonia National Park for new and replacement mobile telephone masts, due to the lack of mobile telephone coverage and the topography of the National Park. This results in the need for more masts to provide coverage. Included within SPG 13: Landscape Sensitivity and Capacity Assessment,

“In more remote areas, telecommunications infrastructure is one of the few developments which by necessity has to be prominently sited. Such developments inevitably affect the perceived wildness of the landscape, by introducing an overt man-made structure into an area perceived as relatively natural and remote from human influence. There can also be an impact on landscapes when there is an increase of structures along established infrastructure corridors. This results in increased visual clutter and development often in highly visible locations. In addition, the visual effects of masts can increase through cumulative visual impact, as prominent sites often contain several, disparately designed developments”

- 1.15 Planning Policy Wales Edition 11 notes that planning authorities should not question the need for telecommunication systems, and the Authority is fully aware of the need for modern communications in order to fully exploit the social and economic development potential of the area. However the Authority will not support the provision of telecommunications infrastructure if the landscape character and visual amenity of the park are seriously compromised through the inappropriate design or location of installations, or where there is significant detrimental effect upon the amenity of those living nearby. In assessing any planning applications, the Authority will carefully consider the landscape evidence and conclusions contained in SPG7 (Landscapes and Seascapes of Eryri) and SPG 13 (Landscape Sensitivity and Capacity Assessment). This SPG seeks to guide applicants and developers about what is acceptable in terms of siting telecommunications infrastructure in the National Park.
- 1.16 A map displaying the current coverage of mobile networks (EE, O2, Three and Vodafone UK) can be viewed by following this [link](https://webcoveragemap.rootmetrics.com/en-GB)¹. (this is a link to an external website and the Authority is not responsible for the information provided)

¹ [RootMetrics Coverage Map \(https://webcoveragemap.rootmetrics.com/en-GB\)](https://webcoveragemap.rootmetrics.com/en-GB)

Eryri Local Development Plan (2016-2031) Telecommunications Policy

1.17 The following policy, from the Eryri LDP, seeks to ensure that the social and economic benefits of better communication infrastructure are met without negatively impacting the surrounding area.

Development Policy 26: Telecommunication (26)

Telecommunications developments will be permitted provided that they do not significantly harm the visual amenity and landscape character of the area or adversely affect the amenity of people living close to the site.

Proposals should therefore satisfy all the following criteria:

- i. It can be demonstrated that an acceptable level of service cannot be provided by:
 - a) the use of a more environmentally acceptable site either within or outside the Park,
 - b) sharing an existing site, mast, tower or other structures.
 - c) sharing an existing or planned underground channel with another utility.
- ii. The cumulative effect of the development in conjunction with similar installations, does not significantly harm the visual character or the landscape character of the National Park.
- iii. The mast, antennae and any ancillary structures are expected to be well designed and represent the best practicable environmental option.
- iv. The radio frequency emissions from mobile base stations and apparatus conform to nationally agreed precautionary principles.
- v. Where there is a risk of significant radio interference, it can be demonstrated that this can be overcome by appropriate measures.

It will be a requirement that redundant or obsolete equipment and buildings are removed and the site is restored within six months of the facility ceasing to operate.

2. National & Local Policies and Context

Planning Policy Wales Edition 11

- 2.1 Planning Policy Wales (PPW) Edition 11 sets out Welsh Government's land use policies and establishes their objectives for conserving and improving natural heritage, landscapes with statutory designations, native habitats, trees and woodlands. PPW 11 notes that planning authorities should provide for the conservation and, where appropriate, enhancement of local landscapes. This may include policies for landscape features, characteristics and qualities of local significance and the designation of Special Landscape Areas (SLA's). In light of this, the SNPA's adopted supplementary planning guidance of 'Landscape Sensitivity and Capacity Assessment' and 'Landscapes and Seascapes of Eryri' are discussed and highlighted within this document.
- 2.2 PPW 11 also states that planning authorities should state which features, characteristics or qualities require extra protection, and explain how the policy or designation will achieve this protection. This is noted within SPG 7 the 'Landscapes and Seascapes of Eryri'.
- 2.3 LANDMAP² and any associated landscape character assessments (including the register of historic landscapes in Wales) should be used to inform local landscape policies, planning applications and SPG's. LANDMAP can be accessed via the Natural Resources Wales website.
- 2.4 Regarding Mobile Telecommunications (*which incorporates both mobile phone and mobile broadband technology and services*), PPW 11 notes that the planning system should help support telecommunications infrastructure where it is required, whilst taking in to account the status of protected land and buildings as well as amenity considerations to protect what is valued most in communities and environment. PPW 11 notes that the impact from new mobile telecommunications infrastructure will be the greatest in sensitive landscapes and other designated areas and should be carefully planned. However it is these areas, which are mostly rural in nature which are affected economically and socially by limited coverage. Proactive but considered planning is therefore essential to ensure greatest coverage whilst maintaining the character of these special areas.

² LANDMAP is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded and evaluated. It is a tool to help sustainable decision-making and natural resource planning at a range of levels, from local to national. It can be found on the NRW website.

2.5 PPW 11 states, the sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case, for example in designated or sensitive landscape areas. The design of masts will be an important consideration where sharing is likely to be the preferred approach and efforts to disguise apparatus should be pursued where necessary. Wherever possible, use should be made of existing buildings and other structures to site new equipment and developers should engage with planning authorities and the community to identify possible locations that could bring additional benefits. Siting should allow for the greatest possible coverage while, so far as is practicable, minimising the impact on amenity and the external appearance of a building. Conditions should also be used to ensure that equipment that is no longer required or in use is removed promptly.

Code of Best Practice on Mobile Phone Network Development for Wales (2021)

2.6 The purpose of this document is to;

- support the roll out of mobile phone infrastructure and to provide guidance with regards to the complex requirements associated with network deployment
- set out an engagement framework for mobile network operators and planning authorities when considering applications for prior approval and/or full planning permission for the improvement of mobile networks
- seek to avoid areas of conflict and to minimise any perceived adverse impacts with the provision of telecommunications equipment
- and support a more collaborative approach to the deployment and improvement of digital connectivity throughout Wales.

2.7 The document also gives advice to applicants on topics such as siting, design, ICNIRP compliance and network deployment considerations.

Technical Advice Note (TAN) 19: Telecommunications (2002)

2.8 This Technical Advice Note should be taken into account by local planning authorities in the preparation of development plans. It may also be material to decisions on individual planning applications and would be taken into account in any called-in planning applications and appeals. Further details from TAN 19 are presented in section 4 of this SPG from page 19.

Future Wales: The National Plan 2040

- 2.9 Future Wales – The National Plan 2040 is Welsh Government’s national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system.
- 2.10 In terms of its ‘Economic Action Plan’, the document supports infrastructure development which includes digital communications, and notes that digital communications can have a positive effect on well-being. The document emphasises that in sensitive locations, and other designated areas, digital telecommunications infrastructure will be carefully located to minimise visual impact.
- 2.11 Policy 13 – ‘Supporting Digital Communications’, within the document notes that planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this.

Other National Publications

- 2.12 Other national documents relative to telecommunications developments can be found on the Welsh Government’s website by following this link; <https://gov.wales/planning-policy-and-guidance-telecommunications> .

Well-being of Future Generations (Wales) Act (2015)

- 2.13 Welsh Government note that the Well-being of Future Generations Act gives the ambition, permission and legal obligation to improve social, cultural, environmental and economic well-being.
- 2.14 The careful planning and development of telecommunications masts can potentially make a significant contribution to the 7 Well-being goals identified in the Act. It is considered that if the ‘5 ways of working’ identified in Act are implemented in the development of masts (from siting, design, consultation through to the submission of a planning application), then this should lead to a more considered and well-designed development.

SPG 7: Landscapes and Seascapes of Eryri (2014)

2.15 This SNPA adopted SPG identifies the key characteristics of individual Landscape Character Areas (LCAs) and Seascape Character Areas (SCA's) and sets out information on how to manage change within them. Although almost all of the landscapes and seascapes in Snowdonia are of outstanding quality, reflected in its designation as a National Park, it is necessary to define landscape and seascape character areas and to appreciate individual characteristic qualities as well as influences which may lead to changes in character. The main purpose of the guidance is to;

- Define the boundaries and name individual Landscape Character Areas (LCAs) and Seascape Character Areas (SCAs) in Snowdonia National Park
- Identify their key characteristics and valued attributes
- Identify forces for change which are likely to influence changes in the landscape – both for the individual LCAs and SCAs and the National Park more generally – mobile/telecommunication masts are not identified as a force for change generally within this document
- Identify landscape strategies for each LCA, setting out how they should be managed and protected in the future
- Identify the sensitive factors for each SCA

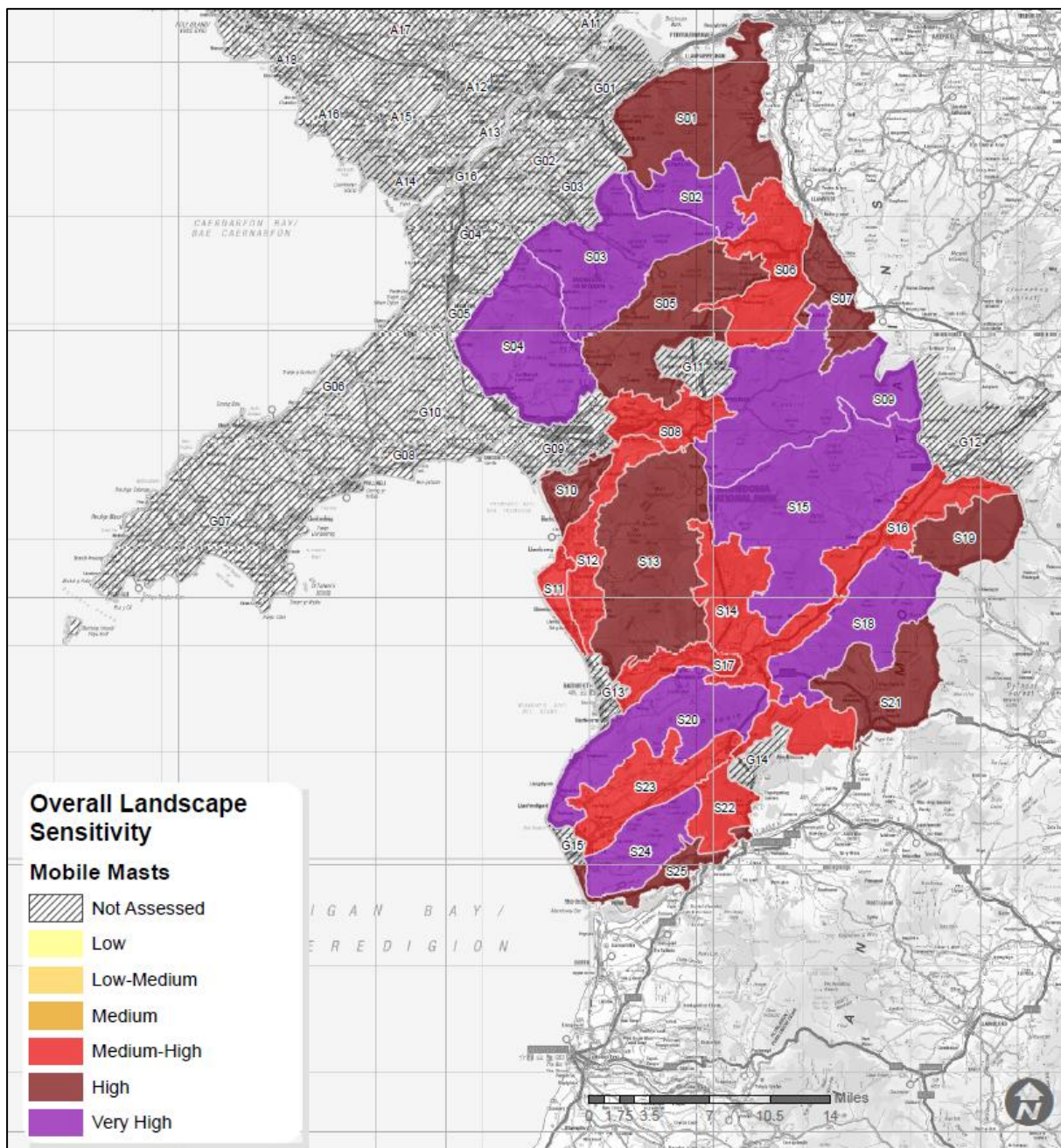
2.16 As the document identifies the key features of Landscape Character Areas within the National Park and how they may be adversely affected by certain developments (for example mobile masts developments), it is a crucial document to consider alongside others, when assessing telecommunication planning proposals.

2.17 As with the Landscape Sensitivity and Capacity Assessment SPG, the Landscapes and Seascapes of Eryri SPG is a material planning consideration when decisions are made on planning applications.

SPG 13: Landscape Sensitivity and Capacity Assessment

- 2.18 This assessment of landscape sensitivity and capacity aims to provide a robust evidence base for determining planning applications, helping to protect sensitive and distinctive landscapes from inappropriate development and encouraging a positive approach to development in the right location and at an appropriate scale. The study, as it relates to Snowdonia, specifically considers the following three development types; renewable energy developments, mobile masts (telecommunications transmission infrastructure) and static caravan/chalet parks and extensions, within the landscape character areas identified in SPG 7.
- 2.19 The acceptability of any development in the rural landscape can be difficult to assess in a rational manner. Whilst it is generally acknowledged that the most valued landscapes should be protected, there are some areas where development can be accommodated, albeit in a controlled way to minimise adverse effects. However, this SPG provides broad strategic guidance on location and impact issues and siting guidance notes to minimise adverse effects for each character areas. Developers should familiarise themselves with each character area and critically analyse, in a more rational manner, the impact of their proposal against identified sensitivity criteria.
- 2.20 As telecommunication/mobile masts by necessity have to be prominently sited, it is important that they are carefully sited and assessed as to avoid the most sensitive areas. The image below shows the general sensitivity of Eryri's Landscape Character Areas to mobile masts developments. (*This study was done on a general LCA level and areas within an LCA may have higher or lower sensitivities compared to the LCA as a whole*).
- 2.21 Section 4 of SPG 13 (found [here](#)) provides a generic guidance on siting and design of transmission infrastructure, and the potential impacts these factors may have on local Landscape Character.

Figure 1



3. Planning Process

Masts – Prior Approval (20 metres and under)

- 3.1 Larger telecommunication developments requires developers to apply to the local planning authority either for prior approval or to submit a full planning application.
- 3.2 The prior approval process is legislated under the Part 24 of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019 (*the main changes occurred in 2019, with minor amendments supplemented in December 2020*) (GPDO) and can be viewed by following this [link](#).
- 3.3 Most forms of telecommunications development which are permitted under Part 24 of the GPDO are subject to a 56 day prior approval procedure. This is due to the fact the development is situated within a National Park.
- 3.4 This process requires the developer to apply to the local planning authority for its determination as to whether prior approval will be required to the siting and appearance of the proposed development.
- 3.5 The local planning authority have 56 days, beginning with the date on which it receives the application, in which to make and notify its determination on whether prior approval is required for the siting and appearance and to notify the applicant of its decision to give or refuse such approval. There is no power to extend the 56 day period.
- 3.6 If no decision is made, or the local planning authority fails to notify the developer of its decision within the 56 days, permission is deemed to have been granted.
- 3.7 Part 24 of the GPDO requires that an application to the local planning authority must be accompanied by:
 - The developer's contact address, and the developer's email address if the developer has one
 - A written description of the proposed development
 - A plan indicating its proposed location
 - Evidence that the owner or agricultural tenant of the land to which the application relates has been notified of the proposed development
 - Where the proposed development consists of the installation of a mast within 3 kilometres of the perimeter of an aerodrome (see page 22 & 23), evidence that the CAA, the Secretary of State for Defence or the aerodrome operator (as appropriate) has been notified of the proposal

- The appropriate fee
- For development involving the construction or installation of one or more antennas (unless they are all small cell antenna), the application must also be accompanied by a declaration that the equipment and installation, when constructed or installed, will operate in full compliance with the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines.

3.8 It is considered good practice that the following is also submitted:

- Evidence that the possible use of an existing mast, building or structure has been considered before submitting an application to erect a new mast
- Information about the purpose and need for the particular development
- Where the proposed development consists of the installation, alteration or replacement of a mobile phone base station on or near a school or college, evidence that the relevant body of the school or college has been consulted about the proposal
- A statement indicating the height of the proposed antenna, the frequency and modulation characteristics and details of power output.

3.9 The National Park Authority should begin the consultations and notification as set out in the regulations as early as possible on receipt of the application in order to allow sufficient time in which to consider the application in light of any representations received.

3.10 The National Park Authority should take into account representations received in determining whether to give or refuse approval for a proposed development. The Authority may wish to discuss with the developers, possible modifications to the proposed development to mitigate the concerns raised by particular consultees.

3.11 Factors to be considered concerning the appearance of the mast and ancillary apparatus include materials, colour and design. The use of appropriate materials and coloration may allow a mast to blend more easily into its surroundings. Features of design which may be considered include dimensions; overall shape; and whether construction is solid or forms an open framework. The Authority should also consider with the developer the availability of alternative designs which might be more suited to the local environment.

3.12 Factors concerning siting, from the Authority's perspective, may involve:

- The height of the site in relation to surrounding land
- The existence of topographical features and natural vegetation
- The effect on the skyline or horizon
- The site when observed from any side, including from outside the authority's own area
- The site in relation to areas designated for their scenic or conservation value
- The site in relation to existing masts, structures or buildings, including buildings of a historical or traditional character
- The site in relation to residential property
- Any other relevant considerations

3.13 In considering the siting and appearance of a mast together with its associated development, the scope of landscaping and screening to reduce the impact of the development on its surroundings will be an important consideration.

Determination not to require Prior Approval

3.14 If the Park Authority determines that prior approval is not required, the development may proceed (a) when the operator receives written notice of such a determination or (b) after the 56-day period expired. The authority should give notice of any determination as soon as possible, rather than allowing the 56-day period to expire without notifying the applicant. The development must be carried out in accordance with the details submitted with the application for the determination or as otherwise agreed in writing by the authority.

Determining to require Prior Approval

3.15 If the authority decides that prior approval is required for the siting and/or appearance of the development, it should give the operator/developer prompt written notice of that determination within the statutory timeframe.

Minor Telecommunications Development

3.16 Some small scale telecommunication developments and operations do not require planning permission, for example television aerials, small satellite dishes on residential properties. In terms of satellite dishes in some cases planning permission and listed building consent may be required. For further information see;

- Planning and guide for householders ([link](#))

- Planning Portal Wales – Interactive Household ([link](#))

Fixed Line Broadband

3.17 In respect to the provision of fixed-line broadband, such developments can rely on permitted development rights provided relevant conditions are adhered to. Within the National Park these are as follows;

- One month's notice in writing must be given to Natural Resources Wales (NRW) and the Local Planning Authority
- The notice must state the developers' intention to install electronic communications apparatus, describe the apparatus and identify the location where they propose to install it
- Cabinet colour must be; green, black (except matt black), or a colour which has the written approval of the local planning authority prior to the commencement of the development
- Any telegraph pole must have the same appearance and be made of the same material as the nearest existing telegraph pole to it which has planning permission, unless an alternative appearance or material has been approved in writing by the local planning authority prior to the commencement of the development.

4. Material Planning Considerations

- 4.1 Snowdonia National Park Authority will consider any development proposal in accordance with the ELDP (2016-2031) as well as its Supplementary Planning Guidance documents which have been discussed above.
- 4.2 Development Policy 26: Telecommunications is shown on page 9, and notes that any proposal put forward should demonstrate that an acceptable level of service cannot be provided by;
- The use of a more environmentally acceptable site (evidence must be presented that other sites have been considered and why they aren't suitable for development e.g. that the alternative sites would have a larger impact, that there would be technical issues etc)
 - Sharing an existing site, mast, tower or other structures
 - Sharing an existing or planned underground channel with another utility
 - The use of a relay mast/antenna
- 4.3 The policy also states that the proposed development should not have a cumulative effect in conjunction with similar installations and that it does not harm the visual character or landscape character of the National Park.
- 4.4 Strategic Policy D: Natural Environment notes that the natural resources, biodiversity, geodiversity and 'Special Qualities' of Snowdonia National Park will be protected from inappropriate development. Proposals should not adversely affect the National Park's biodiversity resources including designated sites from an international through to a local level, as well as wider biodiversity resources e.g. habitats and species outside designated sites. The National Park will advise developers that they must comply with any statutory species protection requirement as referred to in Planning Policy Wales (PPW) and the Technical Advice Note (TAN) 5: Nature Conservation and Planning.
- 4.5 The initial stages in planning any development involve the identification of an appropriate type/scale of development and the consideration and selection of a suitable site in order to minimise landscape and visual effects. For example, choosing an appropriate site may help mitigate the visual impact of a development even before the detailed design stage. As a starting point, the sensitivity assessment of the relevant LCA should be consulted for each potential development to gain an understanding of the baseline landscape character and key sensitivities to that particular type of development.

- 4.6 Developments located within or near to the following will be critically assessed and mitigation measures will need to be provided as well as assessments of potential alternative sites, in line with the policy. These include;
- Areas of high landscape value and sensitive to change (*Guidance will be taken from SPG 7, SPG 13 and LANDMAP*)
 - Areas of high visual sensitivity (*Guidance will be taken from the Landscape Sensitivity and Capacity Assessment – note that this is a strategic study and not prescriptive at an individual site level*)
 - Protected natural designations where there would be an identifiable impact
 - Historic Landscapes, Scheduled Ancient Monuments, World Heritage Sites, Candidate World Heritage Sites and Listed buildings
 - Eryri Dark Sky Reserve core areas – depending on lighting proposals
- 4.7 SPG 7 and SPG 13 are material planning considerations when decisions are made on planning applications. Developers are advised to assess the landscape and visual impact of any proposal on the character of LCAs and consider mitigation measures if there are adverse impacts. A record of this analysis should be included within supplementary information accompanying planning applications. A Landscape and Visual Impact Assessment must be included with the submitted planning application.
- 4.8 The specific siting and design guidelines produced for each LCA may also assist in the selection of a suitable site and type/scale of development.
- 4.9 It is important to note that there are often local variations in the character and sensitivity of each LCA, therefore a site specific analysis should be undertaken to identify any potential landscape and/or visual issues at any given location. As part of this it will be important to consider potential impact on the following;
- Landscape character (particularly key characteristics)
 - Key views (this includes annotated photos of key views, photomontage images and ZTV (zones of theoretical visibility) maps)
 - Special qualities (of landscape designations/remoteness/tranquillity etc)
- 4.10 Impacts on landscape character are likely to be related to the following;
- Landform – whether landform is complex or simple and how the nature of the proposed development relates to this or conflicts with it. Development can dominate small scale or intricate landforms if not carefully sited

- Landcover – how the proposed development fits in or conflicts with the pattern of the land cover and what sensitive features may be at risk
- Man-made influences – does the proposed development introduce an uncharacteristic man-made influence into a landscape

4.11 Proposals will also need to take into account any impact that the development may have on neighbouring LCA's.

Mast and site sharing

4.12 TAN 19 notes that local planning authorities may reasonably expect applications for new masts to show evidence that they have explored the possibility of erecting antennas on an existing building, mast or other structure such as an electricity pylon. Conditions in code operators' licences require applications to explore the possibility of sharing an existing radio site. This evidence should accompany any application made to the local planning authority, whether for prior approval or planning permission,

4.13 Guidance in relation to site sharing is also contained within the Code of Best Practice on Mobile Phone Network Development for Wales.

4.14 If the evidence regarding the consideration of such alternative sites is not considered satisfactory, the planning authority may be justified in refusing planning permission for the development. In such circumstances, the authority should give clear reasons why it considers the evidence before it to be unsatisfactory. It is for the local planning authority in the first instance to satisfy itself as to whether the information which has been provided in this respect is satisfactory and to bear in mind the technical constraints upon network development in reaching any decision.

4.15 In considering alternative sites, the authority will be mindful of the potential impact on the local environment of development on those sites. This will be particularly important where an alternative site would involve the redevelopment of an existing mast for shared use. In certain circumstances the shared use of an existing mast might necessitate an increase in the height or structural capacity, and therefore the visibility, of that mast. Depending upon the characteristics of the location, site sharing as opposed to mast sharing may be more appropriate. A second installation located alongside or behind the principle installation may, for example, provide a more beneficial solution in environmental and planning terms.

4.16 The SNPA will take account of all the advice contained in TAN 19 including the cumulative impact upon the environment of additional antennas sharing a

mast or masts sharing a site or a possible more favourable option of locating a new site.

Design

- 4.17 Masts, antennae and any ancillary structures are expected to be well designed and represent the best practical environmental option. The Authority will consider the suitability of the proposed design, including ancillary development and landscaping. Design options will be affected by site conditions, technical constraints, landscape features and capacity requirements. Its height, ancillary development and the scope for landscaping and screening will also be important considerations.
- 4.18 The applicant/developers should use sympathetic design and camouflage to minimise any impact that the development might have on the surrounding environment. The telecommunication industry is encouraged to continue its development of innovative design solutions. This is not only in terms of the masts and antennas themselves, but of the materials and colouring as well. This also includes masts designed to look like street furniture, and the redevelopment or restoration of existing properties to incorporate telecommunications apparatus. Authorities may wish to discuss with operators, different design options in connection with a particular development proposal. It should be borne in mind that some designs may not be suitable for future sharing. Where it is agreed that a site is suitable for future mast sharing, it may be appropriate to install a mast specifically designed to facilitate its redevelopment for sharing.
- 4.19 Applicants are encouraged to provide the National Park Authority with different examples of design solutions and are also encouraged to explore possible alternative approaches, for example site and mast sharing (as mentioned previously), location and alternative designs for the apparatus. When considering the design of an individual development, in particular mast developments, careful consideration should be given to screening and plantings. The boundaries of the site should be drawn large enough to accommodate the necessary landscaping.
- 4.20 The Authority should ensure that they understand the constraints the operator faces, whether due to the nature of the technology or the legal requirement to provide a service. Operators should be prepared to explain technology and legal limitations, and to discuss the feasibility of alternative sites. Pre-application discussions should help to identify and resolve issues at an early stage, and to facilitate the formal application process.

- 4.21 Furthermore, applicants/developers will be asked to demonstrate and justify that they are using the best design possible based on recognised design guide lines.

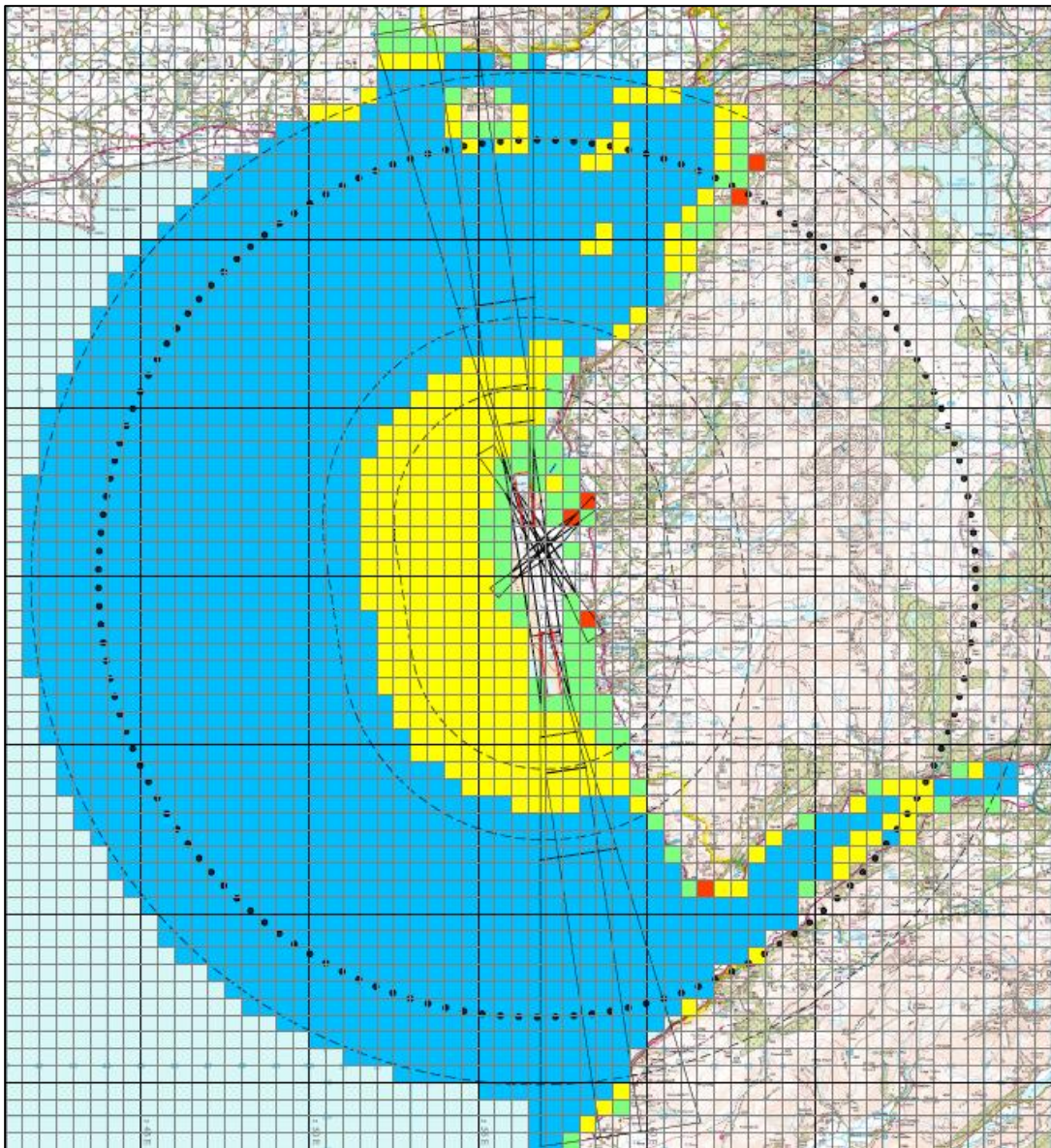
Radio Interference

- 4.22 TAN 19 notes that there are two types of interference. The first type is electrical interference, caused by a radio transmitter or by unwanted signals emitted by other electrical equipment. Only if there is clear evidence that significant electrical interference will arise, and that no practicable remedy is available, will there generally be any justification for taking it into account in determining a planning application. The second type is physical interference. Large prominent structures such as tower blocks, cranes, warehouses or windfarms can cause widespread disruption to television and other telecommunications services due to the physical obstruction or reflection of the wanted signals. Although unlikely to be an issue within the National Park the Authority will need to be satisfied that the potential for interference has been fully taken into account in the siting and design of such developments.
- 4.23 Where the potential for electrical interference to telecommunication or broadcast signals are expected, co-ordination with Ofcom (*formerly would have been contact with the Radiocommunication Agency*) would be required to ascertain whether an engineering solution to the problem is feasible. In such instances, they should be contacted at the earliest stage in the planning process and their advice taken into account. Where such problems are likely, local planning authorities may grant planning permission subject to a condition that, before development commences, the developer will ensure that the quality of any reception affected by the development will be restored.
- 4.24 Where there is a risk of significant radio interference, it should be demonstrated by the applicant that this can be overcome by appropriate measures.

Airspace

- 4.25 Llanbedr Enterprise Zone has been designated within the Eryri LDP, and any proposal for telecommunication development in this area would need to consider any potential radio interference as well as the safeguarded airspace within the area.

Figure 2



**TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (AERODROMES AND TECHNICAL SITES) DIRECTION 1992**

1. For the purposes of the above named Direction, this chart, prepared by SLC Associates, is certified as being the safeguarding chart for the aerodrome known as:

LLANBEDR AIRFIELD

- All development within the outer safeguarding area.
- All buildings, structures, erections and works exceeding 10 metres in height (32.8 feet).
- All buildings, structures, erections and works exceeding 15 metres in height (49.2 feet).
- All buildings, structures, erections and works exceeding 45 metres in height (147.6 feet).
- All buildings, structures, erections and works exceeding 90 metres in height (295.3 feet).
- All applications involving major tree planting schemes, mineral extraction or quarrying, a refuse tip, a reservoir, a sewage disposal works, a nature reserve or a bird sanctuary and all applications connected with an aviation use.

3. The appropriate office for the purpose of consultation is the Airport Manager, Llanbedr Airfield Estates LLP, Llanbedr Airfield, Gwynedd, LL45 2PX, to the extent specified in the key above of any land within.

4.26 With regards to safeguarded airspaces, the map shown previously in figure 2 shows the areas where developments of specific heights are prohibited. The legend attached to the image details the height restrictions for each relevant area, for example areas displayed in red note that no buildings or works exceeding 10m (32.8 feet) should be built there. The Ministry of Defence notes that military fixed wing aircraft may engage in low flying training activities at heights of 76.2m above terrain features within the National Park. For most applications over 50m of height, it is requested that the Ministry of Defence are consulted in order to ensure that there is no conflict of use in the proposed area.

Health impact considerations

4.27 Providing that the development meets the new International Commission on Non-Ionising Radiation Protection (ICNIRP 2020 – [link here to website highlighting the differences between the 2020 guidelines and previous versions](#)) guidelines, planning authorities should not consider the health aspects of mobile telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines.

Need

4.28 As advised in Planning Policy Wales Edition 10, Local Planning Authorities should not question the need for proposed developments. The need for masts is affected by customer usage, their size and the terrain.

Devaluation of property

4.29 Potential devaluation of property arising from telecommunication development is not a planning consideration.

Loss of view

4.30 As mentioned throughout this SPG, telecommunication developments can be very prominent. Loss of view for individual householders is not a material consideration, however if a proposed development is likely to have an adverse effect on visual amenity, then this would be a planning concern. The Authority may seek to mitigate the impact through screening or landscaping, but if it cannot be made acceptable then the application may be refused.

Appendix 1

