



**DMC2019-008**

**APPLICATION FOR PLANNING PERMISSION**

**Application No:**

**18NP0006**

**Proposed Development:**

Installation of a 25m high lattice mast accommodating 3no. antennas and 2no. 600mm transmission dishes and associated ground based equipment. Installation of 3m wide 100m long track from existing gated access to site and creation of 50m wide area of planting to three sides of compound at Brownknowe Field, Greenhaugh, Northumberland, NE48 1PS

**Applicant Name:**

The Secretary of State for the Home Department

**Reason for Committee Decision:**

A member of the Authority has requested that the application be considered by Development Management Committee by reason of potential adverse impacts upon landscape character and visual amenity, in addition to an objection having been received from Tasset and Greystead Parish Council and representations from in excess of three households, contrary to the recommendation that Members approve the application

**Recommendation:**

That Members are minded to approve the application subject to the conditions set out in the report

**1. Introduction**

- 1.1 This application seeks planning permission for the proposed installation of a 25m high lattice mast incorporating 3no. antennas and 2no. transmission dishes (to a total height of 26.3m) on land known as Brownknowe Field, Greenhaugh.
- 1.2 The proposed scheme also comprises the siting of associated ground-based equipment at the mast base including a 3.2m high freestanding pole with satellite dish, foul weather enclosure and generator contained within a 1.8m high mesh fence enclosure topped with barbed wire; a 3m wide 100m long compacted stone access track and turning area; and 50m belt of mixed native tree planting to three sides of the mast compound.
- 1.3 The application site is situated to the eastern side of the main road between Greenhaugh and Lanehead, approximately 230m south of the road junction adjacent to High Lake Cottage.



- 1.4 The site at present comprises an agricultural field which benefits from gated vehicular access from the main road to its western edge, with the proposed mast to be positioned approximately 90m east of the road.
- 1.5 The application site is bordered to the north by High Lake Wood which contains High Lake, understood to be leased to a group known as the West End Anglers, with further agricultural fields to the south. Land levels on the site fall to the west towards the road, continuing to fall to the west towards the Tarsset Burn (located some 350m to the west) and rise to the east towards Hareshaw Common, separated by an unadopted access track.
- 1.6 The mast is proposed by Mono Consultants Ltd on behalf of the Home Office as part of a national government upgrade programme to replace the existing Airwave blue-light communications network with a new 4G platform, which is required as part of the Extended Area Services network (the new communications network system used by emergency services and other public safety users). The proposed mast is required to provide emergency services coverage to the roads connecting Bellingham with Greenhaugh, Charlton, Lanehead and Thorneyburn Common.
- 1.7 The application has been amended during its course in order to include the proposed provision of native tree planting, with subsequent changes to the route of the proposed access track.



Fig. 1: Location map showing approximate position of application site



## 2. Planning Policy & Guidance

### 2.1 National Policies

National Planning Policy Framework (NPPF) (2018)

National Planning Practice Guidance

### 2.2 Local Policies

#### **Northumberland National Park Authority Core Strategy and Development Policies Document (Core Strategy) (2009)**

Policy 1	<i>Delivering Sustainable Development</i>
Policy 3	<i>General Development Principles</i>
Policy 4	<i>Major Development within the National Park</i>
Policy 5	<i>General Location of New Development</i>
Policy 17	<i>Biodiversity and Geodiversity</i>
Policy 18	<i>Cultural Heritage</i>
Policy 19	<i>Tranquillity</i>
Policy 20	<i>Landscape Quality and Character</i>
Policy 22	<i>Trees, Woodlands and Forests</i>
Policy 25	<i>Renewable Energy and Energy Efficiency</i>
Policy 28	<i>Utilities and Infrastructure</i>

### 2.3 Supplementary Planning Guidance

NNPA Landscape Supplementary Planning Document (Landscape SPD)

## 3. Relevant Planning History

None relevant to this site

### ***Other relevant sites***

**18NP0022** Installation of a 10m high lattice mast *[and associated development]* on land at Herdlaw Farm, Elsdon, Northumberland. *Conditional planning permission granted 22.05.2018*

**18NP0023** Installation of a 20m high lattice mast *[and associated development]* on land at Bell Hill, Blindburn, Northumberland. *Conditional planning permission granted 17.05.2018*

**18NP0024** Installation of a 25m high lattice mast *[and associated development]* on land at Quickening Cote, Ridlees Road, Northumberland, Harbottle, NE65 7BL. *Conditional planning permission granted 26.06.2018*



**18NP0026** Installation of a 25m high lattice mast [*and associated development*] on land at Barrowburn Farm, Harbottle, NE65 7BP. *Conditional planning permission granted 21.06.2018*

**18NP0084** Approval of details reserved by condition no. 5 (Landscaping) of planning permission 18NP0023 - Installation of 20m mast and associated works. *Approval granted 12.11.2018*

#### 4. Consultation/Representations

##### ***Statutory and non-statutory consultees***

4.1 **Natural England (revised scheme): No objection.** *No further comments to make; the proposed amendments are unlikely to have significantly different impacts on the natural environment.*

**Original response: No objection.** *The proposed development will not have significant adverse impacts on statutorily protected sites.*

4.2 **Tarset and Greystead Parish Council (revised scheme): No response received**

**Original response: Objection.** *The proposals will have no benefit to the community. The positioning of the mast less than 300m from the nearest residential property is unacceptable and will have a major visual impact on dwellings in the vicinity.*

4.3 **Northumberland County Council (NCC) Highways (revised scheme): No objection.** *No further comments to make*

**Original response: No objection.** *The development will not have a severe impact upon highway safety and is in accordance with the NPPF, subject to the imposition of a condition and informatives relating to a construction method statement and construction phase impacts.*

4.4 **NNPA Landscape and Forestry Officer (revised scheme): No objection.** *The significance of the landscape implications of the proposed development are likely to be reduced as a result of the revised proposals: the existing plantation to the north of the site will aid in mitigating (but would not eradicate) the visual impacts of the development; however once established, the proposed planting should help screen the mast from receptor sites to the south, east and west and provide initial screening in the case of the felling of the woodland to the north.*



*Whilst the proposed development, primarily the top 5m of the proposed mast, would be visible from local receptor sites, the site selection appraisal process undertaken by the applicant, together with the revised mitigation measures, will aid in reducing the effect of the proposed development upon the landscape character and views of this part of the National Park, which whilst undesirable would not be significant. Subject to the inclusion of conditions in respect of external lighting, site remediation, woodland management and landscaping details, no objections are raised.*

**Original response: Objection.** *The site selection process is welcomed, and it is likely that the impact upon landscape character and views of this part of the Park as a result of these other sites would have been more substantial.*

*The application site is set adjacent to an existing predominantly conifer woodland which would help both screen elements of the mast from the north and act as a backdrop when viewed from the south. Approximately 5m of the mast and associated infrastructure would be visible above the woodland canopy (approx. 15m-20m), which is likely to reduce as the trees continue to grow; however, this woodland is relatively mature and approaching its economic felling age. Due to the visual sensitivities of the development, I consider that it is pertinent to also consider the landscape and visual implications of the scheme within the context of the woodland having been clear felled.*

*Owing to its setting and topography, views of the mast from the east would likely be viewed against a landscape backdrop; however when viewed from the valley road, the mast would be viewed against the skyline, which would be undesirable initially but significant should the adjacent conifer woodland be removed. Whilst not addressing immediate visual impacts, a woodland creation scheme (as discussed at pre-app stage) would screen views of the bulk of the mast and would be essential in order to mitigate the landscape and visual effects of this proposed development; however as such a scheme has not been proposed, I object to the application.*

*The ground-based infrastructure does not raise concerns in terms of impact upon landscape character due to its subservient size and dark green colour. The access track should be designed so that a seed bed is applied to the track surface in order to speed up its revegetation, thus lessening visual impact. Should the application be approved, conditions are recommended in respect of site remediation and external lighting.*

4.5 **NNPA Ecologist (revised scheme): No objection.** *No amended comments to make. Whilst the area of low quality wet heathland proposed to be lost is now 0.29ha*



*compared with 0.04ha originally, this is not significant in the wider context and native trees would be planted, the species of which are considered to be appropriate.*

**Original response: No objection.** *The proposed development is unlikely to affect the nearby protected site (Greenhaugh Meadow SSSI/SAC) and therefore no habitats regulations assessment is required; it is noted that Natural England have raised no objections. The Tarsset Burn Local Wildlife Site (LWS) is also unlikely to be adversely affected.*

*The removal of a small amount of upland heathland (0.04ha), taking into account its comparably small size and reported low quality, is not considered a significant loss.*

*Badgers are mentioned in the Ecological Assessment and have been recorded in the vicinity of the site, and this is habitat that would be used for foraging; however there are no records of setts on the site or in the immediate area that would be directly affected by the proposals. A checking survey should be carried out to ensure no badgers are present if works commences more than a year from the Assessment date.*

*Red squirrels are present in the woodland adjacent to the site; whilst this is not directly affected by the proposals, a potential drey was recorded in a tree close to the site. A pre-commencement survey is recommended by the Ecological Assessment in relation to this species.*

*Several species of bats have been recorded in the wider area however it is unlikely that they will be adversely affected by the application. Comments are noted regarding the negative effect of telecoms masts on bats (and other wildlife) however investigations, including The Bat Conservation Trust's "The potential impact of radio frequencies and microwaves on wildlife regarding masts on buildings" guidance note have provided no evidence to support this. Consultations have also been carried out with other National Park Ecologists however there is not a sufficient evidence base to link masts and negative effects on bats or other species; there is also no standing advice from Natural England on this subject. I therefore feel that there is no strong scientific evidence to object on these grounds.*

*Any new lighting required as part of the development could impact upon wildlife foraging; details of this should therefore be provided, if proposed.*

*Following the above I have no objection to the application on ecological grounds subject to the provision of a Construction Environmental Management Plan*



*(CEMP), as outlined in the Ecological Assessment. Should this be supplied prior to determination then comments could be provided on this.*

#### 4.6 Campaign to Protect Rural England (revised scheme): No response received

**Original response: Objection.** *Insufficient consideration has been given to the impact of the development upon the surrounding sensitive landscape, in accordance with NPPF Para. 172.*

#### **Public representations**

4.7 The application as originally submitted was advertised by a notice displayed at the site entrance gate on 17.08.2018, in addition to 4no. neighbour notification letters issued on 09.08.2018.

4.8 Sixty one letters of objection were received to the scheme as originally submitted, raising the following matters:

- Inappropriate development within a National Park;
- Detrimental impacts upon visual amenity, character and appearance of the local area;
- Inappropriate position, height, size and design, particularly the mast's colour and galvanised finished and barbed wire enclosure;
- Absence of landscaping to screen the mast base;
- The development would be an eyesore;
- The development would be highly visible and would break the skyline;
- Adjacent trees would not obscure or shield the development, which would exceed the height of the treeline;
- Detrimental visual impacts resulting from potential future felling of adjacent trees;
- Failure to mitigate visual impacts through alternative site location or mast design;
- Prominent position of application site;
- Unacceptable proximity to dwellings;
- Detrimental impact upon privacy of nearby residents;
- Health impacts of the mast, particularly upon users of Greenhaugh High Lake and Greenhaugh School pupils;
- Noise impacts from the proposed generator;
- No noise impact assessment has been submitted;
- The mast would be intrusive, particularly to Greenhaugh High Lake users;
- Detrimental impacts upon amenity value of National Park, particularly the landscape, and of users of Greenhaugh High Lake;
- Detrimental impact upon views, particularly from Greenhaugh High Lake;



- Detrimental impact upon tranquillity, particularly for users of Greenhaugh High Lake;
- Detrimental impact upon landscape;
- Detrimental impacts upon wildlife including red squirrels;
- The access track would be a scar on the landscape;
- Loss of upland heath habitat;
- Highway safety issues relating to the site access location;
- Detrimental impacts upon tourism potential of area;
- Existing emergency services coverage is adequate - the mast is purposed for mobile phone users;
- Potential for upgrading or extension of mast in the future by mobile phone providers;
- An alternative site of lesser impact should be considered, such as on Forestry Commission land;
- Alternative infrastructure options such as several smaller masts of satellite links should be considered;
- The alternative sites discounted within the application, whilst less convenient, would be of lesser impact and should be investigated further;
- The site has been chosen merely due to its proximity to the road and electricity supply;
- The development is in conflict with NNPA's role to protect, conserve and enhance the natural environment, cultural heritage and amenity of the National Park and their policy to prevent the siting of masts within the open countryside;
- The development would be contrary to a historic NNPA policy not to site telecoms masts in open positions within the Park;
- Procedural issues relating to scope of publicity;
- Failure to consult with or inform adjacent neighbours, across whose land cabling is proposed to be installed;
- The plans submitted do not illustrate the wider impact of the development;
- The plans do not show the exact proposed site location, which could then be altered;
- No pre-application discussions have taken place with local residents or other interested parties;
- Potential vandalism issues;
- Potential destruction resulting from extreme weather conditions;
- The Authority is unable to determine the application on the basis of the absence of detailed information regarding site selection process



- 4.9 One letter of support was received to the scheme as originally submitted, raising the following matters:
- Proposed mast is of importance and benefit to the area;
  - Landscape value must be weighed against value of people's lives;
  - Inclusion of tree planting would screen the lower part of the mast in preparation for the felling of the nearby woodland;
  - Health impact concerns are misplaced;
  - Disappointment in objections from Greenhaugh High Lake visitors to a development that is of benefit to the resident population
- 4.10 A period of re-consultation was undertaken in December 2018 following receipt of amended plans, in which letters were issued by post and email to both those originally consulted and those who had responded to the scheme as originally proposed, in addition to a notice displayed at the site entrance.
- 4.11 Twelve letters of objection were received, raising the following matters:
- Principle of mast remains unacceptable within Northumberland National Park;
  - Detrimental impacts upon landscape;
  - Proposed landscaping would only cover lower section of mast;
  - Proposed landscaping is inadequate and would be ineffective;
  - Mast should be sited in more appropriate location;
  - Health impacts relating to proximity to dwellings;
  - Lack of coverage of roads surrounding Kielder;
  - Height of mast exceeds the Angel of the North;
  - Potential use of mast for mobile telephone coverage;
  - Concerns relating to long-term maintenance of proposed landscaping
- 4.12 Two letters of support were received, raising the following matters:
- Provision of emergency service coverage beneficial to residents and tourists;
  - Concerns relating to visual impact outweighed by benefits to human lives;
  - Proposed planting would provide increased screening;
  - Position of proposed mast appropriate relative to adjacent road and woodland and not on prominent skyline
  - To delay approving the application as submitted would be irresponsible and not in the best interest of the public;



## 5. Assessment

### 5.1 Introduction

5.1.1 The key material planning matters to be taken into consideration in the determination of this application are:

- The principle of the development;
- Design, visual amenity and impact upon landscape character;
- Impacts upon amenity;
- Impact upon National Park special qualities;
- Highway safety;
- Renewable energy considerations; and
- Any other matters

### 5.2 **The principle of the development**

5.2.1 The National Planning Policy Framework (NPPF) makes clear that a presumption in favour of sustainable development is at the heart of decision making. Core Strategy policy 1 seeks to deliver sustainable development, aiming to ensure that development proposals will conserve or enhance the special qualities of the National Park, the effects upon which are discussed in more detail later in this report.

#### *Major development considerations*

5.2.2 The application site comprises an area of approximately 0.5ha and therefore falls outside of the definition of major development set out within the Town and County Planning (Development Management Procedure) (England) Order 2015.

5.2.3 Core Strategy policy 4 provides a local definition of major development, identifying that development is classed as major "*when its characteristics and specific impacts are likely to have a significant impact on the special qualities of the National Park*". As assessed below, the proposed development would not impact significantly upon the Park's special qualities. As such, the scheme would not constitute major development and Core Strategy policy 4 would not be applicable in the determination of this application.

5.2.4 Core Strategy policy 28 states that "*utilities and infrastructure developments which are to serve wider than local needs will be regarded as major development*". The proposed mast would serve the national emergency services network and to a lesser degree would serve the local community in terms of the emergency services coverage provided to the road network, although would not provide personal mobile telecommunications coverage for local people. Notwithstanding this, this part of



policy 28 does not accord with the NPPF and therefore does not constitute a relevant consideration in the assessment of this scheme.

*Location of new development*

5.2.5 The application site is located within the open countryside in which Core Strategy policy 5 limits development to the reuse of existing buildings, with new buildings only permitted where it can be demonstrated that:

- a) *The development cannot take place within an identified Local Centre, Smaller Village or through the reuse of an existing building; and*
  - i. *It will conserve or enhance the special qualities of the National Park; and*
  - ii. *It will provide opportunities for the public to understand and enjoy the special qualities whilst not negatively impacting upon them; or*
- b) *It is replacing an existing building and the new building is not materially larger than the building it replaces*

5.2.6 Having regard for the nature of the proposed development as a purpose-built mast structure with associated equipment; its requirement within this specific location; and the information submitted advising that there are no existing masts or other structures suitable for sharing in this instance, it is accepted that this could not be facilitated within an identified settlement or through the reuse of an existing building, mast or structure. The proposed scheme would not directly enhance the special qualities of the National Park however on balance this would not detrimentally impact upon these and would bring communication benefits in respect of necessary emergency service coverage.

5.2.7 Taking into account the above and having regard for the objections received to the principle of the proposed development within this location, the proposed scheme would not be in conflict with the aims of policy 5 or the NPPF and is acceptable in principle in respect of location.

*Utilities and infrastructure development*

5.2.8 NPPF Chapter 10 advises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being, the expansion of which should be supported by planning policies and decisions.

5.2.9 NPPF Paragraph 113 advises that any new mast sites should be sympathetically designed and camouflaged where appropriate, as discussed in detail in the subsequent sections of this report.



5.2.10 Paragraph 115 directs that applications for new electronic communications development should be supported by evidence including details of the results of any consultations; the exploration of the use of alternative existing infrastructure; and a self-certification statement confirming that the mast, when operational, would meet with International Commission guidelines: this information has been provided to support the application. Paragraph 116 makes clear that such applications must be determined on planning grounds only, rather than seeking to prevent competition; question the need for the system; or set alternative health safeguards different from the International Commission guidelines for public exposure.

5.2.11 Core Strategy policy 28 advises that utilities and infrastructure projects which serve local community and business needs will be supported where specific criteria can be met. As the proposed mast would primarily serve the national emergency services network but would also be of some benefit to the local community in terms of the emergency services coverage (although does not propose mobile telecommunications coverage for local people), the criteria of policy 28 are relevant in the consideration of this application. These are assessed in turn below:

- a) *The proposal does not have an unacceptable impact upon the landscape quality or character, either individually or in combination with other proposals;*
- b) *The siting and appearance of the proposed development seeks to minimise impact upon the special qualities of the National Park;*

5.2.12 NNPA's Landscape and Forestry Officer has raised no objections to the amended scheme, concluding that, whilst the proposed development would be visible from nearby receptor sites and would have some undesirable effects upon landscape character, taking into account the mitigation measures proposed and subject to conditions, this impact would not be significant. NNPA's Ecologist has additionally raised no objections on ecological grounds subject to conditions, taking into account the mitigation proposed. Subject to the inclusion of the recommended conditions which are discussed further within this report, the proposals are considered to meet with the requirements of policy 28 parts a) and b).

- c) *Where electricity distribution lines are required they are undergrounded or, where the Authority is satisfied that this is not feasible, they follow a route of least impact;*

5.2.13 The proposed mast would be served by an undergrounded mains power supply which as noted within the Ecological Assessment would be delivered to the site along a 350m long route from the south west. The application also includes the proposed siting of a generator located within the equipment compound however this would be for back-up use in the event of mains power supply failure only. This is



considered to be acceptable in principle and the proposed scheme accords with the requirements of policy 28 part c) in this respect.

*d) Where the proposal relates to telecommunications development:*

- i. The need for the development should be demonstrated in terms of the operator's network;*
- ii. If proposing a new mast, applicants should demonstrate that they have explored the sites outside the National Park, and if this is not possible, they have looked at the possibility of erecting apparatus on existing buildings, masts or other structures;*
- iii. Where new apparatus are required it must be sensitively designed in order to minimise the impact of the development on the special qualities of the National Park*

5.2.14 The Supplementary Information report states that the development is required as part of an essential emergency services network upgrade in order to provide uninterrupted and high quality coverage to the road network within this specific part of the National Park. This is supported by maps which illustrate both the level of coverage when excluding the proposed mast and that which would be gained through the siting of the proposed mast, both in isolation and in combination with surrounding mast sites. The essential need for the development can therefore be demonstrated through the clear requirement for this service upgrade and the absence of any mast which currently fulfils this necessary requirement, in accordance with part d) i).

5.2.15 The nature of the proposed development in terms of the provision of emergency services network coverage in this specific part of the National Park is such that it is accepted that this could not reasonably be sited elsewhere. The Supplementary Information report also identifies the absence of any existing masts or structures which would be suitable for site sharing in this instance, thus providing additional justification for the requirement for this new structure, in accordance with the requirements of policy 28 part d) ii).

5.2.16 The Supplementary Information report sets out how the proposed development would be designed and sited together with mitigation measures in order to reduce its impacts upon the Park. The report additionally provides details of alternative sites within the Park that were considered prior to submission of the current application, accompanied by the reasons for their being discounted. The information submitted has been reviewed by NNPA's Landscape Officer who has raised no objections, considering this to be acceptable in terms of impact upon the Park's tranquillity and landscape character, noting that the alternative sites identified would likely have had a more substantial impact upon the landscape character and views of this part of the



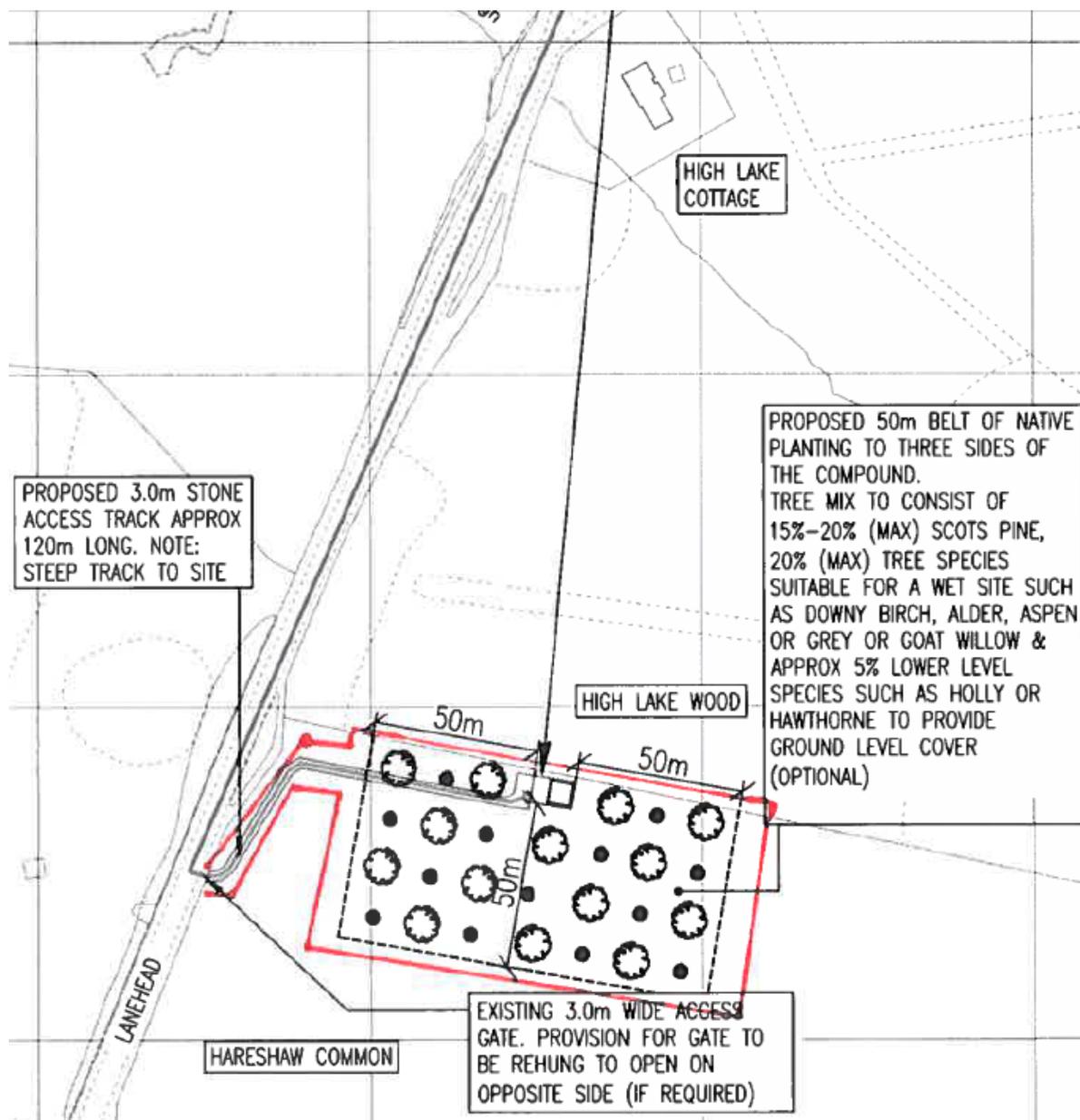


Fig. 3: Extract from proposed location plan showing site layout including landscaping

- 5.3.1 The NPPF highlights the importance of good design principles within planning. This is echoed by Core Strategy policy 3 which requires the design and construction of proposals to protect and enhance local character. NPPF paragraph 113 identifies that new communications infrastructure equipment should be sympathetically designed and camouflaged where appropriate.
- 5.3.2 The proposed mast would be of a lattice style measuring to a total height of 26.3m and would be constructed from galvanised steel, dulling to a matt grey colour. The structure and other ground based development (of which the foul weather enclosure would be painted dark green) would be contained within a 1.8m high mesh fence



compound topped with barbed wire around which on three sides is proposed a 50m belt of native tree planting, with the existing adjacent woodland to the north. The scheme would also necessitate the installation of a compacted stone track approx. 100m in length in order to connect the site to the adjacent main road.

- 5.3.3 The proposed development is acknowledged to be a somewhat undesirable addition within this open countryside location, and would be visible from within the surrounding area. Notwithstanding this, the clearly established requirement for the development as part of the emergency services communications network upgrade, as evidenced through the application, is recognised. The proposed location of this mast is also recognised to derive from a specific requirement to provide emergency services coverage to the roads within the vicinity of the site, with other sites having been explored and subsequently discounted, which the Landscape and Forestry Officer notes would likely have had a more substantial impact upon the landscape character and views of this part of the Park. It is therefore considered that, on balance, having regard for both the objections received and the specific location and design of the scheme and proposed mitigation measures, this clear need outweighs the impacts upon the visual amenity of the surrounding area which would result from the scheme.
- 5.3.4 The application has sought to reduce the impact of the development upon its surroundings through the use of a slim lattice-type mast which would allow light to pass through the structure, thereby minimising its visual mass when viewed against its surroundings. The proposed grey colour of the mast would be lighter than the backdrop of the adjacent trees against which a portion of this would be viewed however this would reduce over time during development of the proposed tree planting and would lessen the mast's prominence when viewed against either the sky or landscape backdrop from both this and other receptor sites, which it is considered would be exacerbated through the use of a dark colour such as green, as suggested within objections received to the scheme.
- 5.3.5 The proposed ground-based development is considered to be acceptable in terms of impact upon visual amenity due to its relatively low height and dark green colour, which would reduce contrary with the surrounding environment. A condition is recommended requiring that the 1.8m high mesh fencing and associated barbed wire also be coloured dark green, in order that these do not appear as visually prominent. Whilst also acceptable in terms of visual impact, a further condition is recommended requiring that the proposed track and turning circle are seeded (details of which would first be required to be submitted for approval) in order to promote their revegetation and assimilation into the landscape to prevent them from becoming unduly prominent within their surroundings.



- 5.3.6 The scheme as amended is accompanied by a landscaping scheme proposing mixed native tree planting within a 50m belt to three sides of the compound. It is accepted that this tree planting will take time to mature however once established, this would reduce the longer term visual impacts of the proposed development, including the provision of a backdrop against which the mast would be viewed from the north at such a time in the future should High Lake Wood be felled, and is therefore acceptable in principle. Whilst the top portion of the mast would be visible above the height of the adjacent woodland to the north, this is further accepted as necessary in order to ensure that the proposed antennas would have sufficient height above the woodland in order to meet the operational requirements of the emergency services communications network in this area, and would not be to such a degree so as to be harmful to the visual amenity of the site or its surroundings.
- 5.3.7 Notwithstanding the details of proposed tree species already submitted which are considered to be acceptable in principle, a condition is recommended requiring the submission of a landscaping scheme providing details of the layout (including location and number), species, maintenance and long-term management, in order to ensure that the proposed planting is appropriate within the context of the site and in order to ensure that the proposed screening would be retained over the lifetime of the proposed development.
- 5.3.8 Taking into consideration the requirement for the development and mitigation measures proposed, the scheme would not have such a significant or detrimental impact upon the visual amenity of the surrounding area so as to warrant refusal, and is considered to accord with Core Strategy policy 3 and the NPPF, in particular paragraph 113.

*Impact upon landscape character*

- 5.3.9 Core Strategy policy 20 seeks to protect the landscape quality and character of Northumberland National Park through the assessment of all proposals in terms of their impact upon landscape character and sensitivity and accordingly its support for appropriate development types.
- 5.3.10 The NNPA Landscape and Forestry Officer has reviewed the information submitted to support the amended scheme and has raised no objections, identifying that whilst visible from local receptor sites, including the adjacent Lanehead to Greenhaugh road, Public Rights of Way to the south east and Open Access land to the east, and being somewhat undesirable, the proposed mast would not have a significant impact upon landscape character and views of this part of the National Park, taking into account the mitigation proposed and site selection and subject to the inclusion of



conditions; these are considered to be reasonable and are therefore recommended to be attached to any grant of planning permission.

5.3.11 Taking into account the proposed design, location and mitigation measures, the development would, on balance, not have such a significant or detrimental impact upon the landscape character of the surrounding area so as to warrant refusal and is therefore considered to be acceptable in accordance with Core Strategy policies 3, 20 and 22 and the NPPF.

#### 5.4 Impacts upon amenity

##### *Residential amenity*

5.4.1 The proposed mast compound would be located approximately 220m south of the closest residential property known as High Lake Cottage, separated by High Lake Wood. The next furthest residential properties, known as Brown Knowe, Crag End Cottage and Crag End, are located some 260m-330m to the south and south west of the application site.

5.4.2 Having regard to the objections received to the scheme relating to detrimental impacts upon the residential amenity of nearby properties, taking into consideration the separation distance between the mast and nearby dwellings including the presence of High Lake Wood between the site and High Lake Cottage, it is considered that this would not result in any overshadowing, loss of light or loss of privacy to the occupiers of these properties.

5.4.3 It is recognised that the proposed development may be visible from the residential properties to the south and south west of the site, and may potentially be visible from High Lake Cottage to the north at such a time in the future that High Lake Wood be felled. The visibility of the development alone would however not warrant refusal of the scheme and taking into account the distance at which the proposed mast would be viewed, the requirement for the scheme and proposed tree planting, it is not considered that this would result in an overbearing impact upon the occupiers of these properties to such a degree as to warrant refusal of the application.

##### *Wider amenity*

5.5.1 The development is proposed to be served by mains electricity supply, with which no noise impacts would be associated. As set out within additional information supplied by the applicant, the generator proposed within the mast compound would only be deployed in the event of mains failure in order to restore power to the site. Taking into consideration this proposed infrequent and emergency-only use for the proposed generator together with both the distance of the application site from noise



receptor sites (both Greenhaugh High Lake and nearby residential properties at around minimum distances of 150m and 220m respectively) and the presence of existing and proposed new trees which would act as a noise buffer in the case of any emergency generator deployment, it is considered that the development would be acceptable in terms of impact upon tranquillity and amenity in respect of noise. Taking the above details of proposed usage levels into account, it is considered that a noise impact assessment was not required to accompany the application in this instance, as cited in objections received to the scheme.

- 5.4.4 The application site is located approximately 150m south west of High Lake, contained within and separated by High Lake Wood, which is understood to be leased to the West End Anglers. A number of representations have been received in objection to the scheme relating to detrimental impacts upon the amenity of users of this Lake.
- 5.4.5 It is recognised that the proposed development may be visible from High Lake by users of this facility: both the top portion of the mast above the existing trees and the lower section of the development at such a time in the future that High Lake Wood be felled. As above, the visibility of the development alone would not warrant refusal of the scheme, and taking into account the distance from which the proposed mast would be viewed, the proposed tree planting which would soften the visual impact of the development and requirement for the scheme it is not considered that this would result in such an overbearing impact so as to warrant refusal of the application.
- 5.4.6 A number of objections to the scheme have raised concerns regarding the health implications of the proposed mast. NPPF paragraph 115 requires that applications for new electronic communications development be accompanied by a self-certification statement which confirms that “*when operational, International Commission guidelines will be met*”, with paragraph 116 making clear that Local Planning Authorities should not set health safeguards different from the International Commission guidelines for public exposure.
- 5.4.7 The application is accompanied by a self-certification statement which provides confirmation that the proposed equipment and installation would be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection. As such, whilst the health concerns raised within objections are noted, it is considered that these are satisfied and this does not form a basis upon which to warrant refusal of the scheme.
- 5.4.8 Whilst regard has been had for the objections received, taking into consideration the requirement for the proposed development and mitigation measures proposed, the



scheme is considered to be acceptable in terms of impact upon residential amenity, in accordance with Core Strategy policy 3 and the NPPF.

## 5.5 Impact upon National Park special qualities

5.5.1 No issues surrounding impacts upon cultural heritage have been identified as part of this application.

### *Tranquillity*

5.5.2 Core Strategy policy 19 provides support for development proposals which conserve the tranquillity of Northumberland National Park, which is to be assessed in terms of impacts upon noise, traffic and light levels generated as a result of development, and upon the sense of openness and quiet enjoyment of the landscape.

5.5.2 Whilst visible from nearby receptor sites, it is considered that the proposed mast and associated ground based development would not have such a significant impact upon the sense of openness or quiet enjoyment of the Park so as to be harmful to its tranquillity, when taking into account its design and proposed mitigation measures. Owing to the nature of the proposed development it is anticipated that vehicular movements to and from the site outside of the construction phase would be minimal and thus to a degree so as not to impact detrimentally upon the tranquillity of the site and its surroundings.

5.5.3 The scheme does not propose the installation of any external lighting. Due to the open countryside location of the site and in order to protect the tranquillity and dark skies of the National Park and ensure that any lighting would not detrimentally impact upon protected species (in particular bat foraging, as noted by the NNPA Ecologist), a condition is recommended requiring that details of any such external lighting required to be installed in the future in conjunction with the proposed development be submitted to and approved in writing by NNPA prior to installation, in order to ensure that this is appropriate within the context of the site location.

5.5.4 Subject to the inclusion of the condition recommended above, the application is considered to be acceptable in terms of impact upon tranquillity, in accordance with Core Strategy policies 17 and 19, NPPF paragraph 180 and guidance contained within the NNPA Landscape SPD.

### *Biodiversity*

5.5.5 Core Strategy policy 17 seeks to protect and enhance the biodiversity of the National Park, as supported by NPPF Chapter 15.



### Protected sites

- 5.5.6 The application site does not fall within any ecological sites of international, national or local importance.
- 5.5.7 The closest internationally protected site is the Greenhaugh Meadow Special Area of Conservation (SAC), which is also registered as a nationally protected Site of Special Scientific Interest (SSSI), approximately 360m north west of the site. The application site lies within the Impact Risk Zones associated with this SSSI; accordingly Natural England have been consulted on the application and have raised no objections.
- 5.5.8 The closest locally designated site (Tasset Burn Local Wildlife Site) is located approximately 300m north west of the site, upon which the NNPA Ecologist considers there will be no adverse impact.
- 5.5.9 In accordance with the findings of the Ecological Assessment and consultation responses received, it is considered that the development would not result in harm to protected sites. This is however subject to the inclusion of a condition (as endorsed by the recommendations given within the Ecological Assessment) requiring the submission of a Construction Environmental Management Plan (CEMP) (and subsequent approval and adherence to this), the contents of which would stipulate how pollution and run-off would be prevented and controlled in order to ensure that there would be no impact upon these protected sites as a result of the implementation of the development.

### Priority habitats

- 5.5.10 The application site falls within an area of upland heathland, which is listed as priority habitat. In accordance with the findings of the Ecological Assessment together with the updated Habitat Survey, and as noted by the NNPA Ecologist, this area of heathland habitat is however understood to be of low quality. Following further survey work, the updated Habitat Survey concludes that the area affected by the development does not in actuality qualify as upland heathland, having an insufficient cover of requisite species, and therefore retracts the recommendation for replacement heathland planting to compensate for habitat loss as put forward by the original Ecological Assessment.
- 5.5.11 The proposed scheme (as amended) would result in the loss of approximately 0.29ha of this habitat; however owing to its low quality the NNPA Ecologist has raised no objections to the scheme on the grounds of habitat removal, taking into account the proposed native tree planting and limited significance of this habitat loss



within the wider site context. It is therefore considered that the development would be acceptable in terms of impact upon priority habitats.

#### Protected/priority species

5.5.12 The ecological survey provides an assessment of the impact of the proposed development upon protected and priority species including badgers, bats and red squirrels, concluding that the proposed development would not result in harm to these subject to the inclusion of conditions relating to construction methodology and pre-commencement checking surveys. The NNPA Ecologist has reviewed the survey and recommendations and has raised no objections in terms of impacts upon protected/priority species, subject to the inclusion of the conditions recommended within the Ecological Assessment; this is considered to be appropriate and it is therefore recommended that these are attached as part of any planning approval.

5.5.13 Representations received to the scheme have raised objections to the development in respect of the negative effects of telecommunications masts upon wildlife; in particular, upon bats. Following review of these representations in relation to available guidance and citing an insufficient scientific evidence base linking masts and negative effects on bats and other species, the NNPA Ecologist has raised no objections to the proposed scheme on this basis.

#### 5.6 Highway safety

5.6.1 The application site benefits from existing gated vehicular entrance from the adjacent main road, which the application proposes to utilise in order to access the development site.

5.6.2 Northumberland County Council (NCC) Highways have been consulted on the application as amended and have raised no objections, concluding that the proposed development would not have an adverse impact upon highway safety, subject to the inclusion of a condition requiring the submission of a Construction Method Statement, in the interests of highway safety and amenity, and informatives relating to construction phase impacts.

5.6.3 The condition and informatives proposed by NCC Highways are considered to be appropriate in order to ensure that the development would be acceptable in terms of impact upon highway safety and amenity, and it is therefore recommended that these are attached as part of any grant of planning permission. Subject to the inclusion of the recommended conditions, it is considered that the development would be acceptable in terms of impact upon highway safety, in accordance with Core Strategy policy 3 and the NPPF.



## **5.7 Renewable energy considerations**

- 5.7.1 Core Strategy policy 25 requires all new developments to minimise the amount of energy used during construction and achieve high energy efficiency, and for all new units of residential, employment, community and tourism development to utilise renewable energy sources in order to offset at least 10% of the predicted energy requirements of the development. NPPF paragraph 153 further advises that new development should comply with Local Plan policies on requirements for decentralised energy, unless it can be demonstrated that this is not feasible or viable.
- 5.7.2 As the scheme does not comprise residential, employment, community or tourism development there is no requirement for 10% of predicted energy requirements to be provided through renewable sources pursuant to Core Strategy policy 25. Having regard for the location of the site, it is considered that the incorporation of renewable technologies would likely be inappropriate and unfeasible in this case. The development is considered to be acceptable in terms of the requirements of both Core Strategy policy 25 and the NPPF in this respect.

## **5.8 Any other matters**

- 5.8.1 The supporting information details that the proposed mast has the structural capacity to accommodate additional equipment in the future for the purposes of mast sharing. Whilst this is noted and supported in principle, limited weight can be afforded to this capability in the determination of this application for the proposed development, as such mast/equipment sharing may not occur in the future and the current application seeks planning permission for a mast as part of the delivery of the Extended Area Services network only. Should an application for planning permission or other relevant consent be required for such mast/equipment sharing, this would be determined on the basis of its own merits.
- 5.8.2 A number of representations to the scheme have raised objections in respect of detrimental impacts upon the tourism potential of the area. Whilst it is acknowledged that the proposed development would be visible from within the surrounding area, taking into account the clear need for the development together with the benefits that this could bring to visitors to the Park in terms of increased emergency service coverage, its overall scale within the wider context of the National Park and the mitigation proposed, there is no evidence to suggest that the mast would be harmful to tourism within the Park and thus to warrant refusal of the scheme on these grounds.
- 5.8.3 An objection has been received from the neighbouring landowner to the west of the site stating that they were not directly informed or consulted on the application or



proposed underground power supply route, which would cross their land. Whilst noting both the proposed power supply route described within the Ecological Assessment and concerns raised by the landowner, the installation of an underground power on land west of the main road (i.e. that understood to fall within the ownership of the neighbouring landowner) does not form part of the scheme sought by this application, as denoted by the red line boundary shown on the Location Plan submitted. Any development proposed outside of this boundary, such as an underground power supply route, constitutes a separate matter to this application which may require additional consent to be sought and notification of the relevant landowner. As such, taking into consideration the scheme for which planning permission is sought, the extent of consultations undertaken by the Authority on this application are considered to have been proportionate and appropriate.

- 5.8.4 Objections have been raised to the scheme in relation to the scope of publicity undertaken as part of the application. The application was originally advertised by means of neighbour notification letters and a notice displayed at the site, in addition to consultation with the relevant Parish Council, with further publicity undertaken following receipt of amendments to the scheme. The publicity undertaken as part of the application is in accordance with the requirements of Part 3 '*Applications*' Section 15 '*Publicity for applications for planning permission*' of The Town and Country Planning (Development Management Procedure) (England) Order 2015; as such, it is considered that this matter is satisfied.
- 5.8.5 Objections have been received to the application citing that no pre-application discussions were undertaken by the applicant with residents and other interested parties. Section 2 of the Supplementary Information report provides details of a consultation undertaken with the Ward Councillor for the site and Local Planning Authority however no details of any further pre-application consultations or discussions have been provided and it is not known whether any have taken place; notwithstanding this, whilst pre-application discussions are encouraged, these do not form a mandatory requirement of the assessment of this application and therefore their absence does not represent a reason for refusal of this scheme.
- 5.8.6 Whilst regard has been had for objections citing potential vandalism and weather-related destruction matters, there is no evidence to suggest that such issues would take place so as to warrant refusal of the scheme on these grounds; it is perceived that the proposed inclusion of a 30cm high section of barbed wire atop the proposed fenced compound, whilst cited as unattractive within a further objection, would aid in preventing vandalism, and the recommended inclusion of a condition requiring this to be green in colour to match the fencing below would ensure that this would not appear as visually prominent.



5.8.7 Further objections to the scheme have suggested that the plans do not clearly show the exact location of the proposed development, which could then be altered, or the wider impact of the scheme. The plans and supporting information submitted are considered to be adequate in terms of illustrating the proposed site location and details of the scheme and providing a basis upon which to determine the application. Should any changes be proposed to an approved scheme based on these details then further consent would likely be required to be sought from the Authority, which would be determined on the basis of its own merits.

## 6. Conclusion

6.1 The proposed scheme would facilitate the necessary implementation of the national government upgrade programme to replace the existing emergency services communications network with a 4G platform as part of the new Extended Area Services network, within which the proposed mast is required to provide coverage to the surrounding road network.

6.2 The proposed development is acknowledged to be undesirable within this open countryside location and would be visible within this setting. Notwithstanding this, having regard for the clear requirement for the development as evidenced through the application, the objections received, and the specific location, design and mitigation measures, it is considered that, on balance, this clear need for the development outweighs the impacts that would result from the proposals, which as discussed would not have such a significant or detrimental impact upon their surroundings or the visual amenity of the area so as to warrant refusal.

6.3 It is therefore considered that, subject to the inclusion of a number of planning conditions, the proposed scheme would accord with the Core Strategy policies, SPD guidance and national planning policy listed within the report.

## 7. Recommendation

Following consideration of the information submitted it is recommended that the proposal should be granted planning permission, subject to the conditions and informatives set out below.

### Conditions

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.



Reason: To ensure that the development is commenced within a reasonable period of time from the date of this permission, as required by Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Application form, received 16<sup>th</sup> January 2019
- Site location plan (Dwg. no. 101 Rev. I), received 5<sup>th</sup> December 2018
- Proposed site plan (Dwg. no. 103 Rev. H), received 5<sup>th</sup> December 2018
- Proposed site elevation and antenna plan (Dwg. no. 104 Rev. E), received 5<sup>th</sup> December 2018
- Covering letter (Our ref: EAS0110F), received 16<sup>th</sup> January 2019
- Supplementary Information report, received 16<sup>th</sup> January 2019
- RF Safety Compliance Certificate – Brownknowe Field, received 30<sup>th</sup> January 2018
- Emergency Services Mobile Communications Programme Supporting Technical Information for EAS0110 Brownknowe Field, received 30<sup>th</sup> January 2018
- TEP Desk Based Ecological Assessment December 2017 Brownknowe Field, EAS0110F, received 9<sup>th</sup> February 2018
- TEP Ecological Assessment March 2018 Brownknowe Field, EAS0110f, received 29<sup>th</sup> March 2018
- TEP Updated habitat survey for site EAS0110F, received 27<sup>th</sup> July 2018

Reason: For the avoidance of doubt, to enable the Local Planning Authority to adequately manage the development and to ensure the proposal accords with Core Strategy policies 1, 3, 4, 5, 17, 18, 19, 20, 22, 25 and 28 and the NPPF

3. The development hereby permitted shall be carried out in accordance with the recommendations described within the 'Summary' section of the *TEP Ecological Assessment March 2018 Brownknowe Field, EAS0110f*, received 29<sup>th</sup> March 2018, including:

- Tree protection measures;
- Timing of works to avoid nesting season (March to August inclusive), unless otherwise detailed within the site Construction Environmental Management Plan (CEMP);
- Site walkover survey for badgers if work not commenced within 12 months of the Ecological Assessment, dated March 2018; and



- Pre-commencement survey of adjacent woodland and ongoing monitoring for red squirrels

Reason: To ensure the development poses no risk of unacceptable harm to protected species and to ensure the development is in accordance with Core Strategy Policy 17 and Chapter 15 of the NPPF and the Conservation of Habitats and Species Regulations 2017

4. Prior to the commencement of the development hereby permitted, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The approved CEMP shall be adhered to throughout the construction period. The CEMP shall, where applicable, provide the information described within the 'Summary' section of the *TEP Ecological Assessment March 2018 Brownknowe Field, EAS0110f*, received 29<sup>th</sup> March 2018, including:

- Pollution and run-off control/prevention measures; and
- A Reasonable Avoidance Measures Method Statement (RAMMS) for breeding birds, red squirrel, reptiles and amphibians

Reason: To ensure the development poses no risk of unacceptable harm to protected species and habitats and to ensure the development is in accordance with Core Strategy Policy 17 and Chapter 15 of the NPPF and the Conservation of Habitats and Species Regulations 2017

5. Prior to the commencement of the development hereby permitted, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The approved Construction Method Statement shall be adhered to throughout the construction period. The Construction Method Statement shall, where applicable, provide for:

- i. Details of temporary traffic management, temporary access, routes and vehicles;
- ii. Vehicle cleaning facilities;
- iii. The parking of vehicles of site operatives and visitors;
- iv. The loading and unloading of plant and materials;
- v. The storage of plant and materials used in constructing the development;
- vi. Measures to control the emission of dust and dirt

Reason: To prevent nuisance in the interests of residential amenity and highway safety, in accordance with Core Strategy policy 3 and the NPPF.



6. Notwithstanding the information already submitted making reference to planting, prior to the commencement of the development hereby permitted, details of the proposed tree planting scheme for the site including layout (location and number), species, maintenance (including any protective fencing to be used) and long-term management (including retention period, routine and emergency maintenance and details of any subsequent replanting following the removal of trees), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping measures shall be implemented in full accordance with the approved details in the first planting season following the commencement of the development.

Any trees, shrubs or plants which die, or are otherwise removed, within a period of five years of the completion of the development shall be replaced in the next planting season with others of a similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of the visual amenity and landscape character of the area and to ensure the development is in accordance with Core Strategy policies 3 and 20 and the NPPF.

7. Prior to the commencement of the construction of the track and turning area hereby permitted, a scheme for the seeding of the surface of the track, including the seed mix, methodology and timescales for this work and details of how the track would be maintained thereafter shall be submitted to and approved in writing by the Local Planning Authority. The track shall be constructed and seeded in accordance with the approved scheme and within the approved timescale, and shall be maintained in accordance with the approved scheme thereafter, to the satisfaction of the Local Planning Authority.

Reason: In the interests of the visual amenity and landscape character of the area and to ensure the development is in accordance with Core Strategy policy 20 and the NPPF.

8. The 1.8m high mesh fence and barbed wire hereby permitted shall be dark green in colour and shall be retained as such in perpetuity, unless otherwise first agreed in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity and landscape character of the area and to ensure the development is in accordance with Core Strategy policies 3 and 20 and the NPPF.

9. Should the development hereby permitted become disused for a period of six consecutive months, it shall be removed in its entirety from the site within the



following three months, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity and landscape character of the area and to ensure the development is in accordance with Core Strategy policies 3 and 20 and the NPPF.

10. Prior to the fixing of any external lighting required in association with the development, details of the external lighting shall be submitted to and agreed in writing with the Local Planning Authority. Details should include:
- The specific location of all external lighting units;
  - Design of all lighting units;
  - Details of beam orientation and lux levels; and
  - Any proposed measures such as motion sensors and timers that will be used on lighting units.

The approved lighting scheme shall be installed in accordance with the approved details and shall be maintained as such during the operation of the development, unless removed.

Reason: In order to ensure that there is no harmful impact upon protected species or the tranquillity and intrinsically dark character of Northumberland National Park and the Northumberland International Dark Sky Park through excessive light pollution, in accordance with policies 1, 17 and 19 of the Core Strategy and the NPPF, in particular paragraph 180.

### **Informative Notes**

1. This planning permission is granted in strict accordance with the approved plans. It should be noted however that:
  - a) Any variation from the approved plans following commencement of the development, irrespective of the degree of variation, may constitute unauthorised development and may be liable to enforcement action.
  - b) You, your agent, or any other person responsible for implementing this permission should inform the Local Planning Authority immediately of any proposed variation from the approved plans and ask to be advised as to the best method to resolve the matter. Most proposals for variation to the approved plans will require the submission of a new application.



2. This consent is granted subject to conditions and it is the owner and the person responsible for the implementation of the development who will be fully responsible for their compliance throughout the development and beyond. Some conditions may require work to be carried out, or details to be approved prior to the commencement of the development.

Where pre-commencement conditions are not complied with, the whole of the development could be unauthorised, and you may be liable to enforcement action. In some circumstances, the only way to rectify the situation may be through the submission of a new application. If any other type of condition is breached then you may be liable to a breach of condition notice.

3. The applicant should ensure that no construction materials or equipment are stored on the public highway unless otherwise agreed and is advised to contact the Streetworks team on 0345 600 6400 for skips and containers licenses.
4. In accordance with the Highways Act 1980 mud, debris or rubbish shall not be deposited on the highway.
5. Should badgers be found during the pre-commencement site walkover survey then a Natural England licence may be required, in which respect the applicant is advised to contact Natural England on 0300 060 3900 or [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk).
6. The proposed development lies within a coal mining area which may contain unrecorded coal mining related hazards. If any coal mining feature is encountered during development, this should be reported immediately to the Coal Authority on 0345 762 6848. Further information is also available on the Coal Authority website at: [www.gov.uk/government/organisations/the-coal-authority](http://www.gov.uk/government/organisations/the-coal-authority)

#### Contact Officer:

For further information contact Rebecca Adams, Planning Officer on 01434 611552 or e-mail: [planning@nnpa.org.uk](mailto:planning@nnpa.org.uk)

#### Background Papers

Application file 18NP0006  
EIA Screening Opinion



18NP0006 Brownknowe Field, Greenhaugh

