

From: [Ross Anthony](#)
To: [Planning \(SMDC\)](#)
Subject: Application Ref. SMD/2021/0412 - Flag Tower, Alton Towers, Farley Lane, Farley, Staffordshire, ST10 4DB
Date: 30 July 2021 10:33:45



Ancient Monuments Society

Defending Historic Buildings of all Ages and all Types

FAO: Lisa Li

By email: Planning@staffs Moorlands.gov.uk

Re: Flag Tower, Alton Towers, Farley Lane, Farley, Staffordshire, ST10 4DB

Application Ref. SMD/2021/0412

Thank you for consulting us on this application. We have reviewed the documents available on your website, and the Ancient Monuments Society has concerns with the application.

The AMS recognises that the grade II listed Flag Tower is already mounted with mobile antenna and related equipment, however given the historic interest of the Tower and its setting within the Grade I listed Alton Towers parkland, we are concerned about the cumulative impact of additional antennae being installed. The application gives almost no assessment of visual impacts of the additional equipment to be installed from around the park, nor the impact to the historic building fabric itself.

The Design and Access Statement acknowledges that 5G equipment cannot be attached to the existing mounts, though there is no detail about the new mounts and how they are anchored to the Tower – e.g. will they be anchored into the mortar to avoid damage to the stonework?

Whilst each new antenna may be a minor addition in itself, the cumulative impact is likely to adversely impact the Tower's appearance, setting, historic building fabric, and its special historic and architectural interest. This would be contrary to paragraph 193 of the NPPF, which states that 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.' Also the Planning (Listed Buildings and Conservation Areas) Act 1990's requirement to have special regard to the desirability of preserving heritage assets, their setting, and any features of special architectural or historic interest which they possess.

Given the importance of a modern mobile network in this location and the ongoing upgrade and replacement of equipment by all the mobile networks that are based at this site, we would encourage your Authority to consider requiring a communications plan to identify if there are other potential less-sensitive sites that would be more appropriate to develop as a future communications hub for the locality.

I would be grateful if the AMS could be informed of the outcome when this becomes available.

Regards,

Ross Anthony

Case Work

Ancient Monuments Society

Registered Charity no. 209605

t: +44 (0)20 7236 3934

e: office@ancientmonumentsociety.org.uk

w: ancientmonumentsociety.org.uk

a: St Ann's Vestry Hall, 2 Church Entry, London EC4V 5HB

The Ancient Monuments Society (AMS) is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. The Society also takes an interest in planning applications affecting historic buildings in conservation areas and undesignated heritage. We concern ourselves with historic buildings of all types and ages.