

**Proposed Smart Metering Installation on Grass Verge to the South Side of A68
(35m East of Village Hall), Rochester, Newcastle upon Tyne, Northumberland,
NE19 1RH.**

**STATEMENT IN SUPPORT
OF
APPLICATION FOR PRIOR APPROVAL
INCORPORATING THE DESIGN AND ACCESS STATEMENT**

January 2020

**Arqiva
Crawley Court
Winchester
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Ref: NE335_306731

EXECUTIVE SUMMARY

The Proposed Development

This application is for the installation of electronic communications apparatus required for the Government's project to develop new Smart Metering network.

Arqiva, an Electronic Communications Code Network Operator, has been appointed by the Department of Energy & Climate Change (DECC) as its implementation partner to develop the Smart Meter infrastructure network in the north of England and Scotland.

The Benefits of the Smart Metering Network

The Government is implementing a programme to roll out, between 2014 and 2020, smart electricity and gas meters to homes and small businesses across Great Britain. Smart Meters are the next generation of gas and electricity meters and this part of the programme is being implemented by the gas and electricity customer suppliers. The Smart Meters will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.

A key feature of Smart Meters is that they are continuously connected to data centres to provide and manage the constant flow of data and functionality. Smart Meters must therefore be linked to an electronic communications network and as indicated above, Arqiva has been instructed by Government to provide a dedicated Smart Metering Network (SMN) for this purpose.

The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies. Indeed, the smart metering programme is one of the top priorities identified in the National Infrastructure Delivery Plan 2016 - 2021.

In providing these benefits the SMN of which this development will form part is one of the Governments key initiatives to help achieve the difficult goals of sustainable

development. This places the development squarely in accordance with the statutory duty placed upon local planning authorities and accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF).

Technical and Operational Constraints

The SMN, like all electronic communications networks, is to be supported by an infrastructure of operational sites with the required antennas and other apparatus needed to provide radio coverage to the local area. In that sense, they have similarities with cellular networks, with the Smart Meters, being the devices that must connect and communicate with the network antennas, rather than mobile devices.

The SMN sites must therefore be located in proximity to the premises that will be served and must be able to communicate with meters that are often located within the heart of a property, for example, in an under stairs cupboard.

Consistent with planning policy, the main sites that form the SMN have been largely planned around sharing or using existing communication sites, buildings and structures and where this has not been possible, new ground based masts. These main installations provide the main umbrella of coverage to larger geographical areas and premises within those areas.

However there are still smaller settlements, peripheral areas and more remote locations that cannot be covered by these sites due to coverage constraints, often related to distance, topography or other environmental related factors. Hence, in order to provide more localised coverage to these areas, a secondary layer of smaller sites, known as *micro sites*, are required and these are generally physically smaller. The application is in relation to a site required for this secondary layer as explained in more detail below.

Site Selection

The micro and repeater sites are required to provide localised coverage over very specific areas and so the siting parameters for coverage reasons are narrow.

The sites must also satisfy a range of operational criteria, such as good fibre connectivity, an existing power supply suitably high and resilient for an electronic communications network, a reasonable level of security and with reasonable vehicular access for ongoing maintenance. In addition, the site must be capable of being constructed without undue constraints and avoiding undue environmental disturbance, that for example, might be associated with creating new access tracks and supplying new power runs above or below ground.

In assessing these various requirements and looking to find an appropriate balance between operational and environmental factors, a sequential approach to site selection has been adopted. Site sharing, utilisation of existing buildings and structures have been explored to best meet the operational need whilst minimising environmental impact. This assessment has shown that there are no options that exist. Thus, in this case, a smart metering radio mast located on the grass verge to the south side of A68 (35m East of Village Hall), Rochester, is needed to provide coverage to the village of Rochester and the surrounding area.

Pre-Application Consultation

Information on Arqiva's planned SMN was provided to the Council on 18 December 2013. Further pre-application consultation in relation to the application site was undertaken with your Authority, local ward Councillors, the Parish Council as well as a number of local residents. We received a response from the NNPA (Colin Godfrey) dated 5th December 2019 as follows;

The NNPA Landscape & Forestry Officer has had an opportunity to provide his initial thoughts on the proposal. He has noted that the existing overhead poles and powerlines within Rochester are due to be undergrounded (it is my understanding that these works are currently ongoing). He would therefore object to the installation of a new vertical structure in the location proposed given the improvements to the local landscape removal of the existing poles and wires will provide.

While the Officer has not had an opportunity to consider alternative sites, and will not have the capacity to do so until the New Year, given that any application advanced on current location of the mast is unlikely to be deemed acceptable on landscape grounds in this protected area, I would strongly recommend that the submission of an application is withheld until a site visit can be arranged to discuss options. Hopefully this will result in agreement of a scheme which is mutually acceptable to both yourselves and the NNPA.

In response to the above, given the likely timescales for any meeting with the NNPA, and time constraints in respect of delivery of the smart metering government project, it has not been possible to arrange a site visit prior to the submission of this application.

Compliance with Planning Policy and other Material Planning Considerations

Policy at national level is set out in the NPPF. The NPPF (under Section 10) views high quality communications infrastructure and systems as essential for achieving sustainable development objectives. This policy has especial emphasis for the SMN, which is a crucial part of a programme required by Government to help reduce power usage and lower greenhouse emissions across Great Britain.

At local level, relevant policy within the Northumberland National Park Authority Core Strategy and Development Policies Document (Core Strategy) (2009) has been taken into account. A sensitive approach has been adopted to ensure an appropriate balance has been struck between operational and environmental considerations to result in a development that is acceptable in all respects. In addition, the fact that the development is part of a programme being specifically required by Government in the wider public interest must carry great weight as a material consideration.

The site chosen falls within the Northumberland National Park, where general landscape and infrastructure policies would apply. Although this framework might constrain conventional forms of development, it well understood that existing communities must be served by the infrastructure and utilities essential to a modern society. The sensitive and balanced approach towards siting does however mean that all reasonable steps have been taken to minimise any perceived visual and environmental impact, whilst still

providing the necessary radio coverage for the SMN and satisfying the other operational criteria.

ICNIRP Compliance

The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance has been provided with this application.

Servicing and Maintenance

Periodic access will be required to the site for maintenance and servicing visits. This will be restricted to authorised personnel only, and therefore the proposal does not give rise to any issues associated with public access.

In conclusion, the proposed development has been sited and designed with reference to pre-application consultation in order to locate the development as sensitively as practicable. Specific consideration has been given to technical requirements and national and local planning policy. The proposal is part of an important Government initiative and is supported by both local and national planning policy. Having regard to all the relevant material considerations the proposal merits support and the application should be permitted, in accordance with the presumption in favour of sustainable development.

1. INTRODUCTION

- 1.1 This statement is submitted in support of the application made in respect of development proposed on Grass Verge to the South Side of A68 (35m East of Village Hall), Rochester, Newcastle upon Tyne, Northumberland, NE19 1RH, as part of a new Smart Metering Network (SMN) that is required by Government.
- 1.2 As shown in detail in the drawings submitted, the development proposes the installation of a very slim-line radio mast, 8 metres high, with a small and unobtrusive antenna configuration at the top, which has been well designed to blend into the existing street scene. The mast, therefore, is similar in appearance to other forms of street furniture that are typically located within many small rural and semi-rural villages such as street lighting columns, although in this case a need to be taller to provide the necessary radio coverage to premises within the village and surrounding area. A small equipment cabinet is also proposed at ground level and again, will not be dissimilar to similar utility street apparatus such as those used by BT to provide broadband connectivity.
- 1.3 Arqiva is an Electronic Communications Code Operator and so benefits from the right set out in Paragraph 9 of the Electronic Communications Code to carry out street works. The Electronic Communications Code is found at Schedule 2 of the Telecommunications Act 1984, as amended. Arqiva also benefits from the permitted development rights set out under Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. Hence in this case, the application is made under the Prior Approval procedures set out under Conditions A.2 and A.3 of Part 16.
- 1.4 In this statement, which incorporates the design and access statement, we go on to highlight the role of the development proposed, within the context of the SMN required by Government. We explain the benefits associated with the SMN, to explain the particular need in this case and to demonstrate compliance with planning policy. We also provide information on health and safety and related issues by way of further reassurance.

2. THE PURPOSE AND BENEFITS OF THE SMART METER NETWORK

- 2.1 The proposed development forms part of the SMN that Arqiva has been appointed by the Department of Energy & Climate Change (DECC) to implement in the north of England and Scotland. Arqiva has been selected by DECC because it is an existing electronic communications code network operator, already responsible for much of the UK's critical communications, for example, the terrestrial television broadcast network and much of the radio broadcast network. Smart Metering is a Government programme to roll out, between 2014 and 2020, smart electricity and gas meters to homes and small businesses across Great Britain. The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies.
- 2.2 A key feature of Smart Meters is that they are continuously connected to data centres to provide and manage the constant flow of data and functionality. Smart Meters must therefore be linked to an electronic communications network. The actual Smart Meters are being installed in premises by the gas and electricity utilities who supply the customers. The Smart Meters must therefore be supported by a new SMN and DECC has awarded the contract to implement this across Great Britain to Arqiva and Telefonica. Arqiva has been selected by DECC to be its implementation partner responsible for deploying and managing the SMN in Scotland and northern England, whilst Telefonica will provide the network to the remainder of Great Britain.
- 2.3 This new SMN will be a 'Wide Area Network' and is a key project in the UK's National Infrastructure Delivery Plan 2016 – 2021. When complete, it will form part of the UK's Critical National Infrastructure. Its deployment and timely delivery is particularly important to achieving a sustainable economy and meeting key Government priorities enshrined in the Climate Change Act 2008, and thereby support the transformation to a low carbon economy.

- 2.4 In due course, the SMN will also be available to water utilities and in similar fashion, consumers will be better able to understand and make informed choices about their use of this natural resource to help reduce consumption and waste.
- 2.5 The proposed development and the wider SMN will, therefore, make a significant contribution towards sustainable development objectives which will help the UK Government to meet its target of reducing emissions by at least 80% on 1990 levels by 2050 and now set down within the UK Carbon Plan. This is relevant to the statutory duty already placed upon local planning authorities under Section 39 of the Planning and Compulsory Purchase Act 2004 and now accentuated by the presumption in favour of sustainable development within the National Planning Policy Framework (NPPF). More specifically, it will help to deliver the aspirations set out in Sections 5 and 10 of the NPPF.
- 2.6 Having regard to the Government's three key dimensions for sustainable development within the NPPF, smart metering will in particular assist in the following ways:
- **An economic role** – smart metering communications will help businesses to be energy conscious, smarter and invest in more energy efficient infrastructure to reduce longer term running costs. Consequential spin offs will, among many, be the creation of new green jobs and technologies, modern and cleaner industries and help stimulate retail sales in more efficient appliances.
 - **A social role** - modern smart metering communications will allow consumers to benefit from real time information on their energy consumption, to help them control energy use, save money and reduce emissions. With greater visibility and understanding of their energy consumption, consumers will be able to make more informed choices about which appliances to use and when. For example, a consumer seeing the power consumption of a tumble dryer might be encouraged to

use a washing line instead or perhaps to avoid operating it during peak periods of demand when pricing is higher.

- **An environmental role** – smart metering communications will help to reduce energy consumption at homes and premises and allow smarter working practices such as better energy management within larger businesses and incorporation of new efficient infrastructure into new developments. In this way modern smart metering communications will help ensure the prudent use of natural resources, alleviate energy waste, reduce carbon footprints and help the UK Government meet its energy emissions set within the UK Carbon Plan.

2.7 However, in order to make this important contribution to sustainable development objectives, the SMN has to be developed first and like all electronic communications networks, will need to be supported by an infrastructure of operational sites. This is no different than railway services, for example, being reliant on the associated infrastructure of lines and stations. In the next section, the particular network requirement from which this application stems is explained.

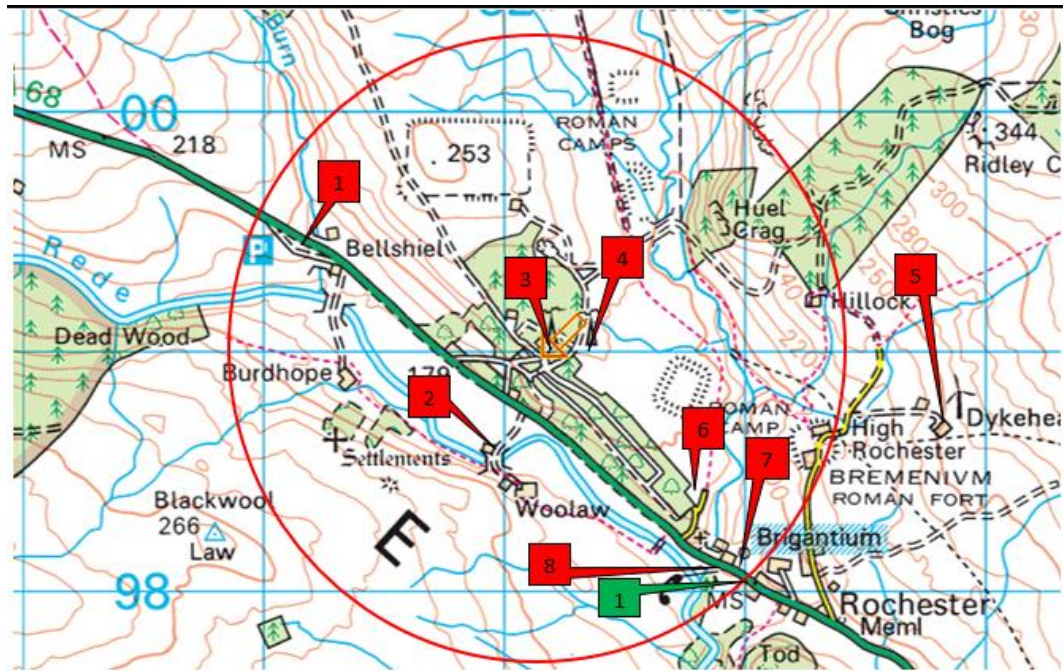
3. THE REQUIREMENT

- 3.1 Arqiva owns and operates the terrestrial radio and television broadcast networks. The company also owns most of the tower portfolio originally developed by T-Mobile (now part of Everything Everywhere) and has rights and manage other masts, towers and rooftops, developed or otherwise suitable for use for electronic communications. In total, Arqiva has access to over 16,000 sites around the UK, which is considerably in excess of the numbers available to any other electronic communications operator in the UK. Arqiva is also licensed to use the 412-414MHz spectrum that will be used as part of the Smart Meter network.
- 3.2 The SMN has been largely based around the utilisation of these existing and other communication sites, buildings and structures and where this has not been possible, new ground based masts. This has allowed Arqiva to minimise the potential visual impact associated with the deployment of the new smart metering radio network, consistent with longstanding statutory and government policy requirements.
- 3.3 These main installations, known as ‘macrocell’ sites, provide the main umbrella of coverage to larger geographical areas and premises within those areas. However, there are still smaller settlements, peripheral areas and more remote locations that cannot be met by these main installations due to coverage constraints, often related to distance, topography or other environmental related factors. Hence, in order to provide more localised coverage to these areas, a secondary layer of smaller sites, known as *micro sites*, are required and these are generally physically smaller. The application is in relation to a site required for this secondary layer as explained in more detail below.

Site Selection

- 3.4 The micro sites are required to provide localised indoor coverage over very specific areas and so the siting parameters for coverage reasons are narrow.

- 3.5 The sites must also satisfy a range of operational criteria, such as good fibre connectivity, an existing power supply suitably high and resilient for an electronic communications network, a reasonable level of security, vehicular or pedestrian access for ongoing maintenance and security of tenure for the life of the SMN contract with DECC. In addition, the site must be capable of being constructed without undue constraints and avoiding undue environmental disturbance, that for example, might be associated with creating new access tracks and supplying new power runs above or below ground.
- 3.6 In assessing these various requirements and looking to find an appropriate balance between operational and environmental factors, a sequential approach to site selection has been adopted. Site sharing, utilisation of existing buildings and structures have been explored to best meet the operational need whilst minimising environmental impact.
- 3.7 The following sites were investigated as possible opportunities for meeting the specific localised coverage needs to the settlement, but were found to be either unsuitable and/or unavailable or comparably no better than the chosen site.



1. A68 Parking Layby, South side of A68 (Eastings 381214 Northings 599421)

This option is located towards the western limit of the search area. While it would provide adequate coverage to the search area, there is no power nearby that could service the site. This option is therefore discounted for this reason.

2. Woollaw Farm, Rochester (Eastings 382041 Northings 598458)

The site is located approximately 250m from the main road, and as such any visual impact would be limited. While within the search area, the site option is on lower lying ground than the preferred option, and as such would not provide as good widespread coverage. This option has therefore been discounted on technical grounds.

3. Existing Vodafone site 5522 (Eastings 382150 Northings 599017)

Time to acquire a possible site share would exceed the build time for deployment, and not therefore meet the timescales for delivering the project. This option has therefore been discounted.

4. Mast on MOD land – Unknown operator (Eastings 382313 Northings 599041)

While this would provide some coverage to the target area, the site cannot be accessed without going onto MOD restricted land. As no operator is known it is assumed to be an MOD mast and therefore non-shareable. The top of the antenna are lower than surrounding tree clutter between the target coverage area. This site has therefore been discounted on these grounds.

5. Existing O2 site 2748 (Eastings 383771 Northings 598755)

While an existing mast site, it is located outside of the search area and would not provide adequate coverage for the target area. Additionally, there is no room within the existing compound to accommodate the extra cabinet due to the existing operators cabin taking up all the available space within the compound. This option has been discounted on technical grounds.

6. Land at Otterburn MOD Training Ground (Eastings 382763 Northings 598387)

While this option would provide good coverage, as MOD land this is again a restricted access area. Furthermore, there is no nearby power to easily access the site. This option has therefore been discounted for these reasons.

7. Footpath to the North side of the A68 Adjacent to the Café Car Park (Eastings 382965 Northings 598091).

This option is within very close proximity to the preferred site option. However, it is close to overhead power, and there may be resultant sight line issues with the car park. It would also be highly visible to the modern holiday cottage beyond the car park. While this option has been discounted, it could be pursued further should the preferred option fail.

8. Grass Verge to the South Side of the A68 between the Village Hall and Café Car Park (Eastings 382965 Northings 598078)

This option is again not located far from the preferred site option, and would provide the same level of coverage to the target area. There are open fields beyond to the north, and it is considered that this option would have more of a visual impact as a result than that of the preferred site option. As above, while this site has been discounted it could be pursued further should the preferred option fail.

NOTE: While the pre-application response received from NNPA was negative in respect of the proposed location of the mast, it is considered that an appropriate search has been carried out in relation to operational/technical requirements as well as environmental considerations. It is noted that the NNPA Landscape and Forestry Officer, while visiting the site to consider the proposed location, has not had an opportunity to consider any alternative sites at this stage.

- 3.8 The proposed installation on Grass Verge to the South Side of A68 (35m East of Village Hall), Rochester, will be well located and sufficiently close to the premises that the SMN will serve, particularly as the mast will operate as a communications hub, both transmitting radio signals but also with the need to collect data from smart meters installed within premises. The site has been selected as it looks to present the optimum solution in terms of balancing environmental and operational considerations. In selecting the application site, there are a number of existing vertical structures within close proximity of the site, most notably telegraph poles immediately to the west and east of the access and exit associated with the garage, as well as another telegraph pole immediately opposite the site. The aforementioned garage building to the south, along with existing vegetation, would provide some backdrop to the site and not therefore spoil any potential views of the countryside beyond. While the NNPA have indicated that the existing overhead poles and powerlines within Rochester are due to be undergrounded, it is still not considered that the proposed slimline 8m mast would have any significant or demonstrable visual impact in respect of the local landscape or special qualities of the National Park, as is the case with the existing overhead structures. Furthermore, Arqiva is looking to install an innovatively designed radio mast, 8 metres high to the base of the antenna, that has been selected as it is the slimmest design available. This would further reduce any resultant visual impact of the mast, with the proposed height the minimum that can meet the operational requirements of the infrastructure.
- 3.9 To help illustrate this in the context of this application, a coverage plot is provided within **Appendix A** of the accompanying Supporting Technical Justification

submitted as part of the application pack. This tends to exaggerate true levels of coverage on the ground, because the modelling only takes into broad account general topography and manmade features. However, they are a useful tool for explaining how the new installation will fit into the SMN planned and being implemented in the wider area.

- 3.10 Our conclusion is that the best balance between environmental and operational considerations is provided by using a specially designed structure at the application site, sufficiently close to the properties that need to be served. This is the reason for the application before you.

4. COMPLIANCE WITH PLANNING POLICY

4.1 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- The Development Plan
- National Planning Policy Framework (NPPF) 2019
- The Code of Best Practice on Mobile Network Development in England

4.2 These documents provide the overall policy background for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. A further major consideration is that the SMN of which the proposed development will form part is a Government initiative based wholly upon the drive to reduce power consumption and green- house emissions and so support sustainable objectives. This initiative is therefore rooted in the same principles that now run through every seam of national and local policy.

The National Planning Policy Context

4.3 The general policy context can be summarised as follows:

- Government policy within the NPPF is to support high quality communications infrastructure and systems – this is especially relevant to smart metering, which is a Government initiative
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites

- Where new installations are required, as in this case, operators should look to develop well designed structures, such as those designed to blend in with the street scene or local setting

4.4 The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasized in paragraph 10 of the NPPF, which states that in order that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, new nationally important infrastructure such as the SMN.

4.5 The importance of the proposed development as part of the SMN is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support.

4.6 The development proposed is comparatively small scale, well sited and well designed and so should be acceptable in every respect. However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

a. Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: "At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." [our emphasis];

b. Paragraph 38, on "decision-making" states that authorities should "work proactively with applicants to secure developments that will improve the

economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.

c. Paragraph 11 advises that authorities should:

- *positively seek opportunities to meet the development needs of their area;*
- *meet objectively assessed needs unless the adverse effects would “significantly and demonstrably outweigh the benefits” ;*

4.7 Paragraph 11 of the NPPF then goes onto state that approving development proposals that accord with an up-to-date development plan **without delay**; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.8 As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development.

4.9 The NPPF (2019) directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

- “b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”
- 4.10 Leading on from this, paragraph 112 states that “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections”.
- 4.11 While supported, the number of base stations are encouraged to be kept to a minimum in which the efficient operation of the network can be provided. Paragraph 113 states that “The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers”. It then goes on to states that where new sites are required, equipment should be sympathetically designed.
- 4.12 It is considered it has been demonstrated the requirement for the new mast in this instance, and that the design of the proposed mast has been selected as it is the slimmest design available. In respect of this, all reasonable steps have been taken through careful siting and design to minimise the visual impact of the development, so far as the technical and operational constraints allow. The proposal is an acceptable design solution that, along with its location with existing mature vegetation that would provide a degree of screening, would not have any significant resultant visual impact.
- 4.13 It should be noted that paragraph 116 states that “Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.
- 4.14 The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential

due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this has to include an understanding of the associated special problems and technical needs of developing communications networks such as the Smart Meter network.

4.15 In respect of the National Park designation, the application site comprises an area of that would fall outside of the definition of major development set out within the Town and County Planning (Development Management Procedure) (England) Order 2015, where para 172 of the NPPF highlights that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues, and that planning permission should be refused for such development within such designated areas unless in exceptional circumstances. This is reiterated to a degree within Core Strategy policy 4 which 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. Again, it is not considered that the proposal would represent any form of ‘major development’ in this respect.

4.16 The proposal outlined within this document and the supporting enclosures is, on balance, consistent with the guidance as set out in Section 10 of the National Planning Policy Framework, which provides further guidance on the Government’s objective of providing high quality communications networks in England, and as located within the village setting would not appear as incongruous within the streetscene and not therefore appear out of context within a village streetscene setting.

Site Specific Policies

- 4.17 Section 15 'Conserving and enhancing the natural environment' of the NPPF sets out the Government's planning policies for the protection of a range of landscapes and habitats. Paragraph 172 of the NPPF requires that great weight should be given to the objective conserving landscape and scenic beauty in National Parks as one of the three specified areas that enjoy the highest level of landscape protection in England. Similar guidance is provided in Core Strategy policy 1, which seeks to ensure that development proposals will conserve or enhance the special qualities of the National Park. As stated above, electronic communications installations, especially of the type proposed are relatively small scale engineering operations and, therefore, cannot reasonably be considered to be major developments.
- 4.18 Notwithstanding this point, the proposed development has wider public benefits and would be in keeping with the aims of para 11 of the NPPF in respect of sustainable development, and more particularly para 11 d) ii which states that any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. In this respect, the following is of relevance in respect to the proposal;
- It forms part of the SMN, a nationally important infrastructure project that forms part of the UK's National Infrastructure Plan. As explained in the Site Selection section of this statement the application site has been properly chosen having regard to the special technical and operational factors as well as environmental and town planning considerations;
 - In this case, the required coverage area is a localised part of the Northumberland National Park and so must be sited within it, as is usual with all other infrastructure necessary to serve the local population ;

- All reasonable steps have been taken, through siting and an innovative design solution specific to this smart metering Government project, to avoid any significant or demonstrable visual impact in respect of the special qualities of the National Park, having regard to technical and operational factors, as located within the village setting would not appear as incongruous within the streetscene and not therefore appear out of context within a village streetscene setting.

4.19 In respect of utilities and infrastructure, the Core Strategy document recognises these are an important part of daily life for residents and visitors to the National Park. With regards to telecommunications development, it recognises that demand for new telecommunications infrastructure is continuing to grow, and that the Authority is keen to facilitate this expansion whilst at the same time minimising any negative impacts on the special qualities of the Park. Core Strategy Policy 28 sets out the assessment criteria as follows;

Policy 28 Utilities and Infrastructure

The development of utilities and infrastructure projects which serve local community and business needs will be supported provided that:

- 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 on the special qualities of the National Park;
- 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;
- d. Where the proposal relates to telecommunications development:
 - the need for the development should be demonstrated in terms of the operator's network;
 - 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; and
 - 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.

Utilities and infrastructure developments which are to serve wider than local needs will be regarded as major development.

- 4.20 As previously highlighted, this application is for the installation of electronic communications apparatus required for the Government's project to develop new Smart Metering network. The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies. Indeed, the smart metering programme is one of the top priorities identified in the National Infrastructure Delivery Plan 2016 - 2021. In providing these benefits the

SMN of which this development will form part is one of the Governments key initiatives to help achieve the difficult goals of sustainable development. In terms of the site selection, the entire search area is within the National Park area and as such there is no option for a site out with the National Park. Paragraph 3.7 of this statement sets out the other sites considered, and subsequently discounted, including the option of buildings, masts or other structures. As such options where not possible, then a new mast is the only available feasible option in this instance. Furthermore, Arqiva is looking to install an innovatively designed radio mast, 8 metres high to the base of the antenna, that has been selected as it is the slimmest design available and specific to the smart metering project, and seeks to ensure that the appearance of the mast minimises any visual impact in respect of the streetscene, and subsequently the special qualities of the National Park.

- 4.21 In addition to the above, Policy 28 also seeks to ensure that such proposal would not have an unacceptable impact upon the landscape quality or character. Furthermore, Core Policy 20 *Landscape Character and Quality* also states that the natural beauty and heritage of the National Park will be conserved and enhanced whilst being responsive to landscape change. All proposals will be assessed in terms of their impact on landscape character and sensitivity as defined in the Landscape Supplementary Planning Document. Development which would adversely affect the quality and character of the landscape will not be permitted. In respect of the Landscape SPD, Rochester would appear to site at the boundary between Rolling Uplands and the Rolling Uplands Valleys landscape character areas. However, it is considered that the village would be within the Rolling Upland Valleys area. The Landscape SPD highlights that one of the key characteristics of this character area is that the wider area is an important part of the setting to the National Park, with the valleys acting as a gateway to the National Park. In respect of the guidelines for development within this area, the main ones relating to the proposed development would be considered as follows;

- The approach routes, key views and gateways to settlements should be protected from inappropriate development;
- Man-made vertical structures which detract from the valley landform, create visual clutter or adversely affect the unfettered skylines which form the distinctive setting to these valleys should be avoided and any such existing structures removed where possible.

4.22 In considering the above, the proposed site location would not be considered as being a gateway location to the settlement given the extent of development and built environment both to the north and south of the proposed site location. In respect of the proposal, while this is for a new vertical structure it is not considered this would detract from the valley landform in this instance, given the village setting of Rochester. Most of the landscape area is outwith any small villages or hamlets, where the landscape character is unspoiled with uninterrupted views and unfettered skylines given the lack of any built environment. However, this is clearly not the case within any such small villages or hamlets within the landscape area, all of which have a strong built environment reflective of their primary role as places where people both live and work, which includes ancillary structures to support the sustainability of such villages/hamlets including power and additional communications infrastructure. This is reflected within the general locale of the proposed location, where there are a number of such vertical structures forming part of the landscape in respect of the existing streetscene.

4.23 While it is acknowledged in the NNPA pre-application response that the overhead poles and powerlines are to be removed within Rochester and replaced with underground cabling, no details of this have been provided and no details could be seen on searching the authorities online application search. Irrespective of this, even if a number of poles are to be removed, it would not be the case that all of the poles would be removed, as there would still be a requirement to retain (or replace) some of the existing poles to provide a source of connection to the properties within the village. As a result, it would still remain the case that such

vertical structure, even if reduced in numbers, would still remain part of the local streetscene context, and not be completely removed altogether. As a result, it is considered that the mast being proposed would not be viewed as being incongruous within a built up village context, and not therefore detract from the landform at this location or have an unacceptable impact upon the local landscape quality or character.

4.24 Given the above, it is considered that the proposal complies with the requirements set out within Core Strategy Policy 28 and Policy 20 in respect of the proposed telecommunications development. Additionally, it should be recognised that irrespective of the installation's use as a communications base station, the introduction of a new tall structure within a particular environment will always be, to some degree, a noticeable addition to those residents and regular passers-by found closest. However, it should be appreciated that the visibility of a development or its location within its immediate context does not automatically result in an overwhelming adverse harm occurring. Indeed, the fundamental principle applied by the applicant is always to minimise the contrast between the communication equipment itself and its surroundings through, where practicable, appropriate siting and design, particularly when the entire search area is within the National Park boundary.

4.25 In respect of location, Core Strategy Policy 5 *General Location of New Development* sets out that development will take place within the smaller villages and hamlets, including Rochester, where it contributes to the provision or protection of village services. As stated previously, Smart metering is a Government programme to roll out smart electricity and gas meters to homes and small businesses across Great Britain. The smart meter initiative is a key part of the Government's programme to cut greenhouse gas emissions, decarbonise the economy and support the creation of new green jobs and technologies. Like all electronic communications networks, it is to be supported by an infrastructure of operational sites needed to provide radio coverage to the local area, meaning that sites must therefore be located in proximity to the premises that will be served. The aim of the proposal is to connect the village to the smart metering

network, thereby providing a government driven service to the village. As a result, it is considered that the proposal would comply with the aims of Core Strategy Policy 5 in respect of the location of new development.

- 4.26 In summary, the sensitive way the development proposed has been conceived and brought forward accords with best practice and forms part of a national important infrastructure project to provide smart metering services to the local area. It accords with the key policy objectives at national level, which are reflected in the relevant policies at local level. The development proposed is, therefore, acceptable in principle and also accords with the more detailed guidance expressed at local policy level.

5. DESIGN CONSIDERATIONS

- 5.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, to assist your determination this section provides a description of the process adopted in the design of the proposals and explains the access considerations. The significant contribution such development makes towards sustainable development objectives have already been outlined earlier.

Physical Context

- 5.2 The site is located within the Northumberland National Park, as is the entire search area. The proposed site is located within the main development limits for the village of Rochester, to the south side of the A68 on the grass verge between the access and exit from the garage that sits beyond the verge a short distance further to the south. There are a number of existing vertical structures within close proximity of the site, most notably telegraph poles immediately to the west and east of the access and exit associated with the garage, as well as another telegraph pole immediately opposite (north) the site which provide a degree of visual context for the mast. Beyond the poles to the north the land rises, with a large band of trees and new timber framed development prominent within the landscape. The aforementioned garage building to the south, along with existing vegetation, would provide some backdrop to the site against which the mast would be viewed. On the north side of the A68, there are a number of properties along a terraced row slightly to the east, with the majority of the built environment continuing east of this terraced row. The Village hall is located a short distance to the west beyond the exit of the garage a number of properties, with a number of other properties further west on the north side of the A68. As highlighted previously in this statement, the overall physical context is that of a village setting, with its associated built environment as well as ancillary infrastructure.

Amount, Design, Layout and Scale of the Development

- 5.3 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in the previous sections of this statement.
- 5.4 For example, the height of the mast, the numbers of antennas and their size, is the minimum amount of development required to provide coverage for the smart meter network. The mast, a very simple, slimline pole design supporting a single antenna, has been chosen as this is of similar appearance to other types of man-made vertical structures such as streetlights, that are a common feature of townscapes and landscapes both in urban and rural areas across the UK.
- 5.5 The same design considerations apply to the equipment cabinet, which is of similar size and design to other types of roadside cabinets commonly found in urban and rural areas. The location of the equipment cabinets, and the electronic communications equipment housed within them, reflects the technical and operational requirement to be in reasonable proximity to the antenna systems they support.

Access Considerations

- 5.6 The installation as proposed will utilise the existing access to the garage site, and would not require any upgrading of this existing arrangement.
- 5.7 Once constructed, the development will be unmanned requiring only periodic visits about once every two to three months for routine maintenance and servicing. The site will be easy to access for this purpose and typical visits will be by an engineer using a light vehicle that will be parked lawfully nearby.

Landscaping

- 5.8 In view of the nature of the development located within a village setting and context, a scheme of hard or soft landscaping is not considered necessary or appropriate in this case. The development is similar to other man-made utility

and communication structures commonly found in street locations without and dedicated associate landscaping.

Appearance

- 5.9 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, the local topography and natural features should help minimise views. Insofar as the mast and equipment cabinet would be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure.

6. ICNIRP COMPLIANCE

- 6.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained within the NPPF, it is not necessary, to consider further the health aspects and concerns about them, which include the perception of risk.

7. SUMMARY AND CONCLUSIONS

- 7.1 The proposed development forms part of Arqiva's planned Smart Meter network, which is being created as part of the government's initiative to roll out smart electricity and gas meters to homes and small businesses across Great Britain between 2014 and 2020. The network forms part of the UK's National Infrastructure Plan and the information provided by smart meters will help consumers to better manage and reduce energy use and potentially save money. Smart meters will play an important role in the government's policies to achieve a transition to a sustainable and low-carbon economy.
- 7.2 The use of the application site looks to provide the best balance between operational and environmental considerations. The site is located so that it can provide the required level of coverage to the properties it needs to serve, and the use of an innovatively designed slim line structure will ensure that it appears similar to other street furniture commonly found within a village setting. The design and appearance of the structure should, therefore, be acceptable in this instance. Height is limited to operational requirements, with the 8m mast significantly smaller than the more standard 12m smart metering masts proposed as part of this roll-out.
- 7.3 This statement has demonstrated that the proposal is in accordance with national policy set out in the NPPF and its detail complies with local policy objective and would not have any significant impact in respect of visual amenity within the locale or that of the surrounding landscape.
- 7.4 In conclusion, the application merits support and there are no material considerations that would outweigh the social and economic benefits of the proposal, that would add significant weight in the planning balance.