From:
 Robert Mayhew

 To:
 DC Consultation

 Cc:
 Colin Godfrey

Subject: RE: Planning Application Consultation 20NP0007 on the grass verge to the south side of A68, Rochester,

Northumberland

**Date:** 03 February 2020 09:24:51

Application Reference Number: 20NP0007

Proposed Development: Installation of an 8 metre high smart metering radio mast and associated works on the grass verge to the south side of A68, Rochester, Northumberland.

Dear Colin,

Thank you for consulting me on the above proposed development. I would like to make the following observations with respect to the landscape and Dark Sky Park implications for the National Park, of the proposals set out in the applicant's documentation.

My first observation is that whilst the applicant has indicated on the application form that this structure is 8 metres high, it is my understanding that the mast, with its antenna attached is to be at least 9.15 metres high, possible higher, (see drawing 306731-00-003-MD001) although the final top height would appear not to be known at this stage as the drawings indicate that this is still TBC, To Be Confirmed? It is not clear from the application documentation but given where the 9.15m. line is drawn, the total height of the supporting mast and antenna could be 10 metres high.

Secondly, reading the Statement of Support, the applicant Arqiva suggest that they have been appointed by The Department of Energy and Climate Change, (DECC). For clarity, the contract to undertake this project may have been awarded by DECC but I believe DECC became part of The Department for Business, Energy and Industrial Strategy BEIS in 2016 so I assume that this smart metering work is now being undertaken on behalf of BEIS these days. I stand to be corrected though.

Thirdly, I note that within the Supporting Technical Justification for Site Reference NE335 - A68 West Bound Grass Verge document, and in the Design and Access Statement, the applicant suggests that the UK Government's aim is for all homes and small businesses to have smart meters by 2020. My understanding is that, since November 2019, this date has been extended to 2024 although again I stand to be corrected.

Lastly, it was disappointing that, whilst the nature of the wifi mast may not come directly und the definition of mobile communications, the applicant Arqiva did not see fit to follow the principals of the <u>Joint Accord</u> set out between National Park's England and Mobile UK with respect to early engagement, joint site visits and collaborative working before the location of this mast site in Rochester was identified.

With respect to any implications on the Dark Sky Park status of the National Park I do not

believe that this development will have an effect on this designation as no external lighting has been identified within the application.

With respect to the landscape character, setting and visual effects of this proposed development I have already expressed my concerns with respect to the applicant's choice of site in the village of Rochester. As the applicant was informed via communication with the Planning Case officer, the existing overhead wire clutter is in the process of being removed and undergrounded by the local electricity distribution network company, Northern Powergrid. This work is being undertaken in line with the guidance set out by the Office of Gas and Electricity Markets (Ofgem) in their Fact Sheet 109, Electricity Networks and Conserving Natural Beauty. Section 11A of the National Parks and Countryside Act, 1949, places a responsibility for 'Relevant Authorities' including statutory undertakers, to 'have regard to' National Park Purposes and conserving landscape character, views and visual tranquillity are all relevant with respect to a development of this nature. The importance of protecting tranquillity is also identified in Statement of Environmental Opportunity No. 4, first bullet point of the Border Moors and Forests National Character Area profile, the NCA that this proposed development is set within.

The development site lies within the Rolling Upland Valleys Landscape Character Type, specifically the Redesdale, Otterburn and Elsdon Valley Landscape Character Area. The Northumberland National Park Local Development Framework, Landscape Supplementary Planning Document, identifies that 'The wider area is an important part of the setting to the National Park – the valleys act as corridors and gateways to the National Park'. This is particularly so in Redesdale as the A68, the third border crossing between England and Scotland passes through Rochester village. This proposed 10 metre high development is positioned approximately 3 meters from the edge of this road and will be in direct line of sight for road users travelling in a north-westerly or south-easterly direction. I note that no mitigation proposals have been put forward by the applicant to try and screen the development from the key receptor sites.

In the applicant's Design and Access Statement the applicant identifies the two relevant guidelines for development for the Redesdale, Otterburn and Elsdon Valley Landscape Character Area, namely that:-

- 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;

I do not accept the findings set out in paragraphs 4.22 and 4.23 of the Design and Access Statement. The A68, passing through the heart of the village of Rochester, clearly provides key views to the village itself and surrounding landscape. The mast is located directly outside the village hall, a key community building within the village and would be viewed

directly in line of sight when exiting this building. In short, I do not think that there is actually a more visually prominent or intrusive location that this mast could have been located within the village! I do not believe that the requirements of the Core Strategy policies 20 and 28 have been met in this instance.

Given that the existing electrical wire infrastructure is in the process of being taken down, this proposed development, in its current proposed location, standing at around 10 metres high would in my view have a significant detrimental effect upon the landscape character, setting and views associated with the village of Rochester and for road users of the A68. I therefore object to the proposed development in this location.

I am aware of the importance of the rollout of the Smart Metre Network through my work sitting on the Northern Powergrid key stakeholder panel. Having looked at this application and the alternative sites identified I do not accept the reasons given for the dismissal of alternative sites 3, 4 and 8 have been given sufficient due diligence. With a project extension to 2024, I would suggest that time is less of an issue. I believe that greater effort should be given to exploring opportunities for mast sharing as emphasised in the NNPF. Sharing existing masts should reduce the carbon footprint associated with the project and also minimise the impact on the natural capital of the National Park. Failing that, I believe that there are other locations in the specified search area also worth considering. In line with the Authority's pre-application approach and as previously stated by the Planning case officer, I would be more than happy to meet on site with the applicant, and local representatives from the Rochester community and MOD staff, to see if a more amenable location can be found. It is just a pity that the applicant did not contact the planning authority when the original site selection visit was undertaken; or has the site selection been undertaken by means of a desk study? It is not clear form the application form that the applicant has actually attended site yet so I would appreciate confirmation of this.

If you require any further clarification on the points raised above or need more information please do not hesitate to get in touch.

Kind regards

Robert Mayhew

Landscape and Forestry Officer

Head of Conservation

----Original Message----

From: DC Consultation

Sent: 28 January 2020 10:22

To: Robert Mayhew

Subject: Planning Application Consultation 20NP0007 on the grass verge to the south side of A68, Rochester, Northumberland

Please see the attached consultation regarding a planning application which has been received by Northumberland National Park Authority. Full details can be viewed at <a href="http://nnpa.planning-register.co.uk/plaPlanningAppDisplay.aspx?AppNo=20NP0007">http://nnpa.planning-register.co.uk/plaPlanningAppDisplay.aspx?AppNo=20NP0007</a>

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## Robert Mayhew, Head of Conservation

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