

**From:** [Laura Garth](#)  
**To:** [Laura Garth](#)  
**Subject:** FW: 20NP0007 Smart Metre at Rochester  
**Date:** 21 February 2020 17:00:35  
**Attachments:** [image001.png](#)  
[image003.png](#)

---

**From:** Martin Brown [REDACTED]  
**Sent:** 21 February 2020 16:02  
**To:** Colin Godfrey  
**Subject:** RE: 20NP0007 Smart Metre at Rochester

Mr Godfrey.

I have been looking on the National Parks website at the online application, and note there are a number of representations to the application. As such, I would take this opportunity to provide some response to the main points made.

- In terms of consultation undertaken, as you will be aware we engaged in pre-application consultation with the LPA, Parish Council, Local Ward Councillors and nearby residents to the proposed site. It is noted that some of the representations suggest that sufficient consultation was not undertaken in this instance. However, there was no issue raised in this regard from the LPA, and the neighbours engaged with would have exceeded those that would actually be neighbour notified by the LPA as part of any planning application. Furthermore, given that pre-applications are considered as sensitive by LPAs, and not published online, the consultation undertaken is more than that with many proposals, particularly given the scale of the proposal. It is not considered that insufficient engagement was undertaken, and indeed would consider the engagement undertaken contrary to this view.
- I note from your previous correspondence, and as highlighted in most of the representations, reference to the existing vertical poles in the area being removed and put underground. As you will be aware, telecommunications equipment such as this cannot be routed underground, and required to be above ground in order for the equipment to communicate. The option of investigating any possibility of having the equipment underground is not therefore an option. While I acknowledge the references made to the Northumberland National Park Landscape Character Type 10 (Rolling Upland Valleys (Northumberland National Park Local Development Framework – Landscape)), and in particular the guidelines for development in this character type states: *'Manmade vertical structures which detract from the valley landform, create visual clutter or adversely affect the unfettered skylines which form the distinctive setting of these valleys should be avoided and any such existing structures removed where possible'*. While removing some structure, where practicable, can obviously enhance the setting of any landscape character, consideration has to be given to the fact that the site location in this instance is that of a village context, where such structure would be expected, and not in a more rural setting where such structures may appear visually incongruous in this respect. Furthermore, despite any exercise being undertaken to remove any existing vertical structure, the Local Planning Authority should not use this as reasoning not to support any future applications for vertical structures such as that of the Smart Metering pole, and such proposals should therefore be assessed on their own merit in respect to the relevant material planning considerations. This is echoed within paragraph 114 of

the National Planning Policy Framework (NPPF) 2019, which states that; *'Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development'*. This would also be the case for Local Plan Policy 28. This reflects the Government's aims to provide a world class communications network, and in doing so acknowledgement that the supporting infrastructure has to be placed above ground and serve all areas, including National Parks and more rural areas. As a result, I would consider the fact that while existing vertical poles within the general local are being removed and replaced underground, as this is practicable for such existing infrastructure such as power and telephone lines, this should not prevent any new above ground infrastructure being supported, especially when it looks to contribute towards the Governments key initiatives to help achieve the difficult goals of sustainable development.

- A number of the representations suggest that the proposal would have a road safety impact, and would somehow distract drivers given its 'visually prominent' location. As you will be aware, the Roads Authority have not objected to the application, and made no concerns or observations in this regard. The mast, at its thickest point, is 170mm and tapered as the height increases. For context, they are similar in appearance to streetlight columns. As such, the proposal would not have any impact in terms of road safety, and any local concerns over speeding through the village is not a matter for consideration in assessing and determining this planning application.
- In terms of the issues raised about the visual impact, the proposal would see the installation of a very slim-line radio mast, 8 metres high, with a small and unobtrusive antenna configuration at the top, is an innovative design to SMN as these masts a similar in appearance to existing street furniture that can be seen in many urban and rural areas. Whilst such structures may not be readily provided within the general locale, the point is that they are structures that one would expect to see even in small settlement within rural areas, and not therefore visually incongruous structures within a built environment context. Furthermore, 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. In terms to the reference made to the proposal being contrary to para 172 of the NPPF, given the aforementioned, and scale of development, it is not considered that the proposal would have any significant detrimental or demonstrable visual impact in respect to the landscape and scenic beauty of the National Park. The fact that that the site is within a National Park does not prevent development taking place, and while it is acknowledged that both national and local policy will always seek to ensure that development conserves or enhances the landscape setting of the National Park, it is simply not possible that all development within the National Park will enhance its setting. As a result, it is more to do with ensuring that proposals do not detrimentally or demonstrably impact on their visual setting and amenity as stated, and given the scale of the proposal, located within a village setting

with a significant built environment, the proposal would not appear as being visually incongruous to this setting, and therefore have no detrimental or demonstrable impact on the landscape setting or special qualities of the National Park to any significant degree.

- At 8m in height, it is considered that the scale of the proposed pole would be very similar to that of common street furniture. There are many examples within the National Park of such structure as shown below;



Main road through Otterburn

Elsdon

- In terms of alternative sites, while many of the representations suggest that other site options would be available, an extensive survey was undertaken, details of which are included within Section 3 of the supporting statement submitted with the planning application. These alternative sites are discounted for a number of varying reasons, details of which are provided. It is not the intention of this email to once again set out these reasons, which would be in accordance with paragraph 115(c) of the NPPF. Additionally, in terms of the location of the equipment, 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, that are often located within the heart of a property, for example, in an under stairs cupboard.

- Consultation has also been undertaken with the Highways Authority, who have raised no issues to the proposal. The dispute over ownership, and the legal rights of the Highways Authority to support such equipment on than that they maintain (within a certain distance of the edge of the highway).
- In reference to the potential impact on any nearby listed buildings, the nearest is 180m to the west of the application site, a significant enough distance, when also added to the design, appearance and scale of the proposal, would in no way have any resultant detrimental or demonstrable impact in terms of the setting of any nearby heritage assets.

The above summaries some of the key points raise in the representations. There are a number of other issues such as the determining or previous applications by the Park Authority, health and safety concerns, etc, that are not material planning considerations and as such these points will not be addressed.

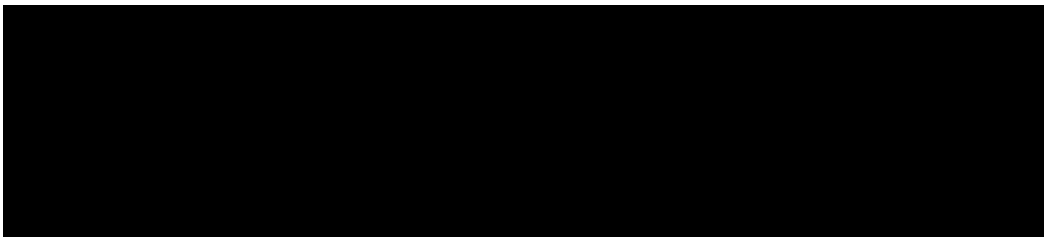
I trust the above is of assistance, and provides a form of response to these issues raised.

Kind Regards  
Martin

Martin Brown  
**Senior Planning Manager**  
**The Harlequin Group**

Tel: [REDACTED]  
Web: [REDACTED]

Email Contents and attachments are without Prejudice and Subject to Contract



**Laura Garth, Planning Technical Officer**  
**Tel: 01434 611545 (x229)**  
**Mob:**

**IMPORTANT NOTICE - Disclaimer - Officers are expressly required not to make defamatory statements and not to infringe or authorize any infringement of copyright or any other legal right by email communications. Any such communication is contrary to ICT policies and outside the scope of the employment of the individual concerned. Northumberland National Park Authority will not accept any**