

DELEGATED DECISION REPORT

Application Reference Number	20NP0007
Description / Site Address	Installation of an 8 metre high smart metering radio mast and associated works at On the grass verge to the south side of A68, Rochester, Northumberland
Expiry date of publicity / consultations	18 February 2020
Last date for decision	10 March 2020

Details of Proposal

This application has been submitted in order to determine whether prior approval is required from the Local Planning Authority for the proposed installation of an 8m high smart metering radio mast and associated works on the grass verge to the south side of the A68, approximately 35m to the south-east of Rochester Village Hall. This request is made to the Local Planning Authority under Part 16 ‘Communications’ Class A ‘Electronic communications code operators’ of the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO)(as amended).

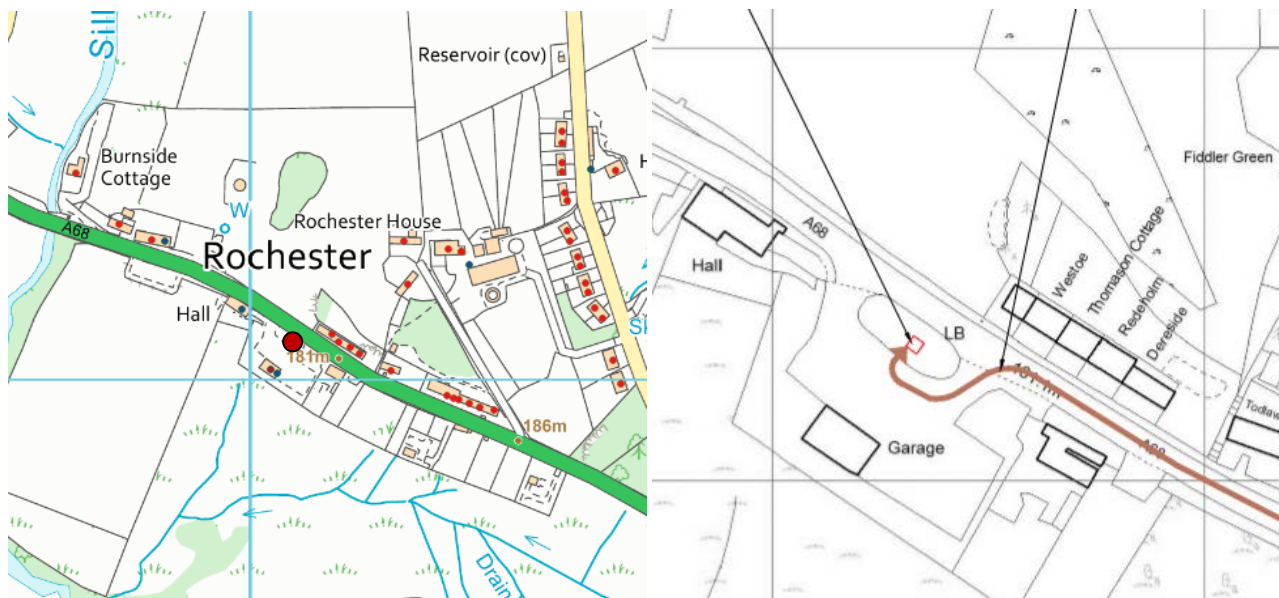


Figure 1: Site Location Plan

The application site is located on an area of grass verge within Rochester, to the south side of the A68 and to the south-east of Rochester Village Hall. The mast would be directly to the front of the parking area associated with the currently unoccupied Redesdale Filling Station site. The proposals consist of an 8m high smart metering mast, 1no. Smart metering Omni antenna, 1no. Smart Metering GPS and 3G antenna along with ancillary equipment incorporating a smart metering enclosure and power pillar, both of which would be fixed to a concrete base.

The information submitted in support of the application indicates that the mast is required as part of the government initiative to roll out smart electricity and gas meters to homes and small businesses across the country and that the proposed location has been selected as it *‘looks to present the*



optimum solution in terms of balancing environmental and operational considerations. While the submitted information refers to the mast as being 8m, the total height including antennas would be closer to 9.5m. As part of this process the applicant has identified eight alternative sites which were considered, and discounted, on various technical, environmental and procedural grounds.

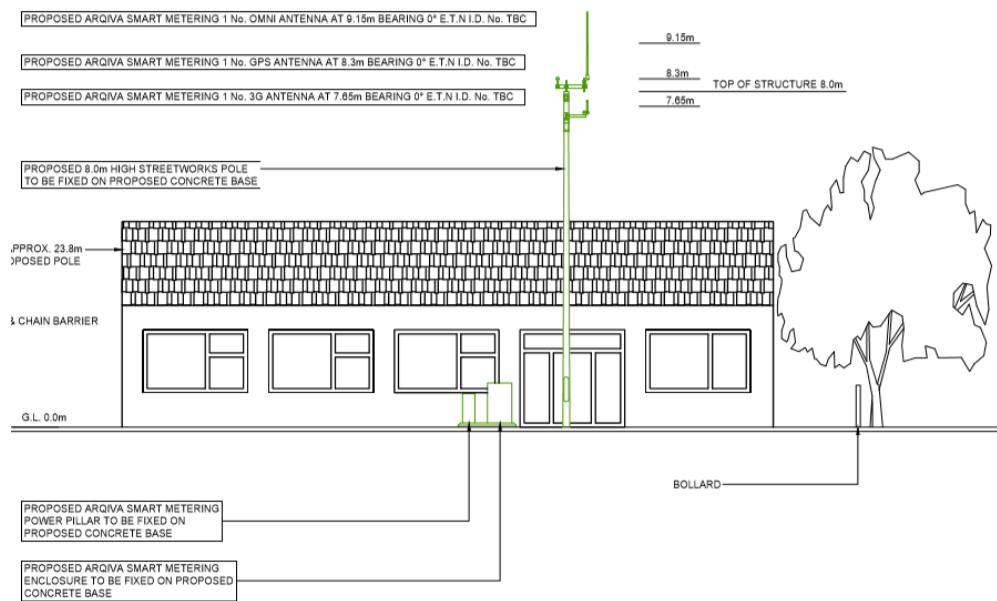


Figure 2: Proposed Elevation

Planning Policy & Guidance

National Policies

National Planning Policy Framework (NPPF) (2019)

National Planning Practice Guidance

Local Policies

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

- Policy 1 *Delivering Sustainable Development*
- Policy 3 *General Development Principles*
- Policy 20 *Landscape Quality and Character*
- Policy 28 *Utilities and Infrastructure*

Northumberland National Park Local Plan 2017-2037 Publication Draft Plan (NNPLP)

- Policy ST1 *Sustainable Development*
- Policy ST2 *General Development Principles*



Policy ST4	<i>Spatial Strategy</i>
Policy DM1	<i>Community Facilities and Infrastructure</i>
Policy DM11	<i>Landscape, Tranquility and Dark Night Skies</i>

The NNPLP has been submitted to the Secretary of State for examination. Comments from the Inspector have been received as a result of the Hearing at the end of January 2020. As some of the policies within the NNPLP are subject to modification and further consultation, it is considered they can currently be afforded little weight. However, policy DM11 of the emerging NNPLP which is relevant to the current application is not subject to modification and can be given more weight. It is however the view of the LPA that consideration of the policies within the NNPLP would not materially alter the assessment of the proposals as undertaken below.

Paragraph 213 of the NPPF advises that weight should be given to relevant policies in existing plans according to the degree of consistency with the NPPF i.e. the closer a policy in a local plan accords with the NPPF, the greater the weight that may be given to them. The adopted development plan is the Northumberland National Park Core Strategy (2009) and the policies within the Core Strategy are considered to be in accordance with the NPPF and can therefore be given due weight.

Supplementary Planning Guidance

NNPA Landscape Supplementary Planning Document (Landscape SPD)

Relevant Planning History

There is no relevant planning history in relation to the site.

Consultation/Representations

Rochester and Byrness Parish Council: Objection for the following reasons:

- A project is currently underway to underground cables in Rochester which is welcomed by residents and visitors as removing obstruction to the wonderful scenery within Redesdale. As such there is no appetite for the proposals and it is felt very insensitive by the applicant to add a mast which would reverse some of the benefits the underground cabling project is bringing to the community;
- The Statement paper (page 13) suggests alternative options that have been considered and rejected by the applicant. The Parish Councillors believe many of these other locations would be far more preferable than what is being suggested. Reading the reasons provided it would appear laziness or monetary reasons for suggesting the chosen location. It is not believed that there would be any objection should either option 2 or 3 be chosen. The PC can provide photos, if required, that show two masts currently located on Redesdale Camp that both have easy access and are in close proximity with each other.
- Supporting plans suggest that the mast will be higher than the 8m documented by at least a couple of metres;



- No approach to the landowner has been made to locate the mast on his land;
- Many local residents who did not have time to reply to Harlequin within the stated timescales have approached the Parish Council stating their objection on the detrimental visual impact the mast will have;
- Councillors believe that the tight timescale for installation of the mast is the reason for the proposed siting of the mast as it appears to be the quickest, easiest and cheapest location and may be the reason no consideration has been given to the negative impact on the local landscape;
- The Parish council would be open to communication from the applicant to identify a more appropriate location.

NCC Highways: Holding Objection: Additional information required as to how the mast will be fixed to the concrete base to avoid it falling on to the public highway; a block plan is required showing details of parking for maintenance vehicles associated with servicing of the proposed mast.

NNPA Landscape & Forestry Officer: Objection: On landscape grounds and lack of due diligence in considering alternative, less harmful sites;

The application was advertised by means of a notice displayed at the site on 30th January 2020 and notification letters sent to seven neighbouring properties. In response, 12 letters of objection have been received which can be summarised as follows:

- The proposed mast is on my land and no representation by the company has been made to myself or my agents;
- The proposal would affect the management of my land which is tenanted and potential futures use of the land for affordable housing within the village boundary;
- While the application may be approved, I will oppose construction of the mast and ancillary works on my land and would also oppose parking for maintenance vehicles on my land;
- The provision of a manmade vertical structure is contrary to the guidelines for development relating to the Northumberland National Park Landscape Character Type 10 Rolling Upland Valleys;
- the provision of the mast will negate any benefits derived from the undergrounding of overhead lines and removal of poles which is currently ongoing in the village;
- The development is contrary to NNPA objective 2.1.2. 'To conserve and enhance the National Parks distinctive characteristics and sense of place';
- The proposals are contrary to Core Strategy policy 28;
- It will negatively impact the special qualities of the National Park;
- Adequate consideration hasn't been given to other sites;
- The antenna is closer to 10m rather than 8m;
- The mast is extremely close to the A68 which will be a big hazard and distraction to road users;
- As the smart metres are linked and can communicate between each other using the mesh method, why does the mast have to be so high?;
- It would be better to locate the mast on higher ground;



- The mast does not sit comfortably in the landscape due to its height and inability to screen it from the road;
- The development is not sympathetic to the existing structures nearby in terms of scale, height and situation;
- Wellbeing of local community being overlooked due to the visual impact and public perception of the effects of EMF waves;
- The proposal is contrary to the NPPF Section 15/172 which states that '*great weight should be given to conserving and enhancing landscape and scenic beauty to National Parks*';
- Has the applicant explored the possibility of erecting the mast in a more appropriate area?;
- Agree with the NNPA Landscape and Forestry Officer that it is in the most visually prominent and intrusive location possible;
- Is there evidence of noise pollution or health risks caused by locating such a structure so close to nearby family homes?;
- It will look hideous;
- Worried about the radioactive levels it will give off;
- The proposal does not acknowledge or respect its setting within a National Park and its adjacency to significant historical structures;
- If there is a necessity for a mast, a more discreet and suitable location should be considered.
- Alternative sites should be considered i.e. outskirts of the village, higher ground;
- The mast should not be in the centre of the village;
- The local community have not been adequately informed / consulted;
- As the provision of smart metres is not at present a legal requirement, more time should be allowed so that full, transparent and community-based impact assessments can be undertaken.
- Further consideration should be given to the alternative sites dismissed within the report;
- The proposed mast will negatively impact on the listed properties located towards the end of the village;
- The mast would be in eyesight of everyone transiting through the village as well as those who live there;

An additional objection has also been received from the Trustees of the adjacent Rochester Village Hall which is summarised below;

- The visual impact detracts from the environment and outlook of the village;
- Due to its height, the structure does not blend in to the village environment and is totally alien and out of keeping with the general appearance of the landscape;
- The NNPA and electricity companies have rid the village of poles carrying electricity supply cables to conserve, enhance and preserve the environment;
- The erection of a pole of this size is contradictory to national park policy and should not be allowed under any circumstances;
- Previous applications have gone to appeal and been rejected for a lot less impact than the mast will have;



Assessment

The issues to be taken into consideration in the assessment of this application are:

- The principle of the development; and
- The siting and appearance of the development

The principle of the development

Development by or on behalf of an electronic communications code operator for the purpose of their electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code, consisting of the installation, alteration or replacement of any electronic communications apparatus can be undertaken under permitted development rights set out within Part 16 Class A (a) of the 2015 GPDO (as amended), subject to the criteria set out within legislation. Where these criteria are met, an application must be submitted to the Local Planning Authority to determine whether prior approval of the LPA is required in relation to the siting and appearance of the development.

The proposed development would be undertaken by or on behalf of an electronic communications code operator for the purpose of their electronic communications network in, on, over or under land controlled by that operator or in accordance with the electronic communications code; consist of the installation of any electronic communications apparatus; and not exceed a height of 15m above ground level. Based on the information made available to the Local Planning Authority it is therefore considered that the requirements set out within Part 16 of the 2015 GPDO (as amended) have been met. The principle of the development is therefore deemed to be acceptable by virtue of meeting these requirements.

The siting and appearance of the development

Both Core Strategy policies 1 and 3 are supportive of proposals which conserve or enhance the special qualities of the National Park, including landscape. In relation to utilities and infrastructure, Core Strategy policy 28 a) states that projects will be supported where the proposal does not '*have an unacceptable impact upon the landscape quality or character..*' with part b) requiring the siting and appearance of development to seek to '*minimise impact on the special qualities of the National Park*'. Part d) which relates specifically to telecommunications development, requires new apparatus to be sensitively designed '*in order to minimise the impact of the development on the special qualities of the National Park*' with it demonstrated that the applicant has '*..explored sites outside the National Park, and if this is not possible, they have looked at the possibility of erecting apparatus on existing buildings, masts and other structures*'.

In relation to infrastructure, policy DM1 Part 6 (a-c) of the emerging NNPLP states that proposals for new, improved or supporting infrastructure will be permitted where

- a) They represent the least harmful option reasonably available having regard to any operational requirements and technical limitations that are applicable;



- b) The design minimises impact on visual amenity, including the character and appearance of the locality and the wider landscape; and
- c) There are no unacceptable adverse impacts on the National Park's special qualities.

The proposal is for the provision of an 8m smart metering mast and associated infrastructure. While the mast is 8m, the information submitted in support of the application indicates that the mast will support an omni-antenna giving an overall height of approximately 9.5m.

The application site is located within the broad Border Moors and Forests National Character Area. More specifically, the NNPA Landscape Supplementary Planning Document (SPD) identifies the site as falling within the 'Rolling Upland Valleys' Landscape Character Type and within the 'Redesdale' Character Area. The Guidelines for Development detailed within the SPD for Redesdale include *'The approach routes, key views and gateways to settlements should be protected from inappropriate development'* and *'Man-made vertical structures which detract from the valley landform, create visual clutter or unfettered skylines which form the distinctive setting to these valleys should be avoided and any such existing structures removed where possible'*.

While it is accepted that this application relates to development within a village rather than an open countryside setting, the NNPA have worked constructively with Northern Powergrid on a scheme of undergrounding works which will result in the removal of much of the overhead lines and poles which currently provide visual clutter within Rochester. It is therefore disappointing that the applicant did not engage in any meaningful dialogue with the LPA prior to the submission of the application in order that these undergrounding works could have been given due weight by the applicant when considering an appropriate location for the mast. Similarly, the views of the Parish Council and the local community appear to have been given little weight when considering the siting of the mast.

While the elevational plan provided in support of the application shows the mast and supporting infrastructure set against the backdrop of the former Redesdale Filling Station, the LPA do not consider that this gives a true reflection of the impact on the local landscape that the provision of the mast is likely to have. This is in part due to there being a distance of approximately 25m between the building and the mast, with the mast being located close to the highway, meaning that the view shown in the elevational plan will only be experienced by users of the road / pavement in very specific circumstances i.e. when users are directly in-front of the mast (to the north-east). The mast will generally be viewed in isolation rather than in the context of the existing building (Figures 3, 4 and 5). In addition, on the approach from the south-east and north-west, the existing building will not provide a backdrop to the development.



Figure 3: View of application site and A68 from the north-west

The applicant has argued that given its slim design and height, the mast would be similar to other structures expected in a small settlement within a rural area and would therefore not be visually incongruous. The LPA accept that structures of the type proposed can be accommodated within a village setting without causing undue harm to local landscape character. However, it is the prominent roadside location, away from existing development which makes the presence of a mast in this location particularly harmful to its setting.

The Landscape and Forestry Officer has been consulted on the proposal and noted that whilst the applicant has indicated on the application form that the structure is 8 metres high, the mast, with its antenna attached would be at least 9.15 metres high (drawing 306731-00-003-MD001) with the total height of the supporting mast and antenna potentially being in the region of 10m. This point has also been noted by the Parish Council and members of the local community.



Figure 4: View towards the site from the north-west



The Officer has also noted that while supporting information suggests that the UK Government's aim is for all homes and small businesses to have smart meters by 2020, his understanding is that this date has been extended to 2024, allowing additional time for constructive discussion with the LPA over appropriate locations for the siting of the mast. Disappointment has also been expressed that whilst the nature of the mast means that it may not come directly under the definition of mobile communications, the applicant did not follow the principals of the Joint Accord 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 decided.

In relation to landscape character, setting and visual effects of the proposed development, the Officer has expressed concern over the applicant's choice of site in the village of Rochester. The Officer has noted that the applicant was made aware that 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 all of which are relevant with respect to a development of this nature. As noted, the proposal falls within the Border Moors and Forests NCA. The [Border Moors and Forests National Character Area profile](#), Statement of Environmental Opportunity (No. 4) stresses the importance of protecting tranquillity within the NCA.



Figure 5: View towards the site from the south-east

In assessing the proposal, the Landscape and Forestry Officer has noted that the development site lies within the Rolling Upland Valleys Landscape Character Type, specifically the Redesdale,



Otterburn and Elsdon Valley Landscape Character Area (LCA). In relation to this LCA, the Northumberland National Park Local Development Framework, Landscape Supplementary Planning Document (SPD), states 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'*. The Officer has noted that this is particularly so in Redesdale as the A68, the third border crossing between England and Scotland, passes through Rochester village. The 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. The Officer has also noted 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;

The Officer has rejected the findings set out in paragraphs 4.22 and 4.23 of the Design and Access Statement in relation to the level of impact the proposal is likely to have on landscape character. The Officer notes that the A68 passes through the heart of the village of Rochester and 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 summary, the Landscape & Forestry Officer has stated that:

'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'.

In an e-mail dated the 21st February 2020, in light of comments received from consultees and local residents regarding the on-going undergrounding works in Rochester, the applicant has stressed that given the nature of the smart metering infrastructure being proposed, it is not possible to be undergrounded. The applicant has further stated that the current undergrounding works should not be used as a reason not to support any future applications for vertical structures with reference made to paragraph 114 of the NPPF which states that *'Local Planning Authorities should not impose a ban on new electric 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.

In this instance the LPA are not seeking to introduce a ban on new electric communications or impose an Article 4 direction, rather the concern the LPA have in relation to the current application is that the proposed mast is in a prominent roadside location which will have a significant detrimental effect upon local landscape character and the visual amenity of residents, visitors and people travelling through the settlement. As noted by the Landscape and Forestry Officer, the mast could not be sited in a more '*visually prominent or intrusive location*'.

While the applicant has stated that the current undergrounding works should not influence consideration of this application, the introduction of a new vertical structure in an area where visual clutter is currently being removed to improve the landscape of the National Park, is a material consideration. The applicant has also stated that the undergrounding works should not '*prevent any new above ground infrastructure being supported, especially when it looks to contribute towards the Government key initiatives to help achieve the difficult goals of sustainable development*'. However, as noted by paragraph 172 of the NPPF, '*Great weight should be given to conserving and enhancing landscape and beauty in National Parks, the Broads and Areas of Outstanding Beauty, which have the highest status of protection in relation to these issues*' and, as it is considered that there are potentially less harmful locations for the mast which have not been given adequate consideration, the benefits of the proposal would not outweigh the harm to the landscape of the National Park. The proposals are therefore considered to be contrary to the requirements of Core Strategy policy 28 and policy DM1 of the emerging NNPLP.

The Landscape & Forestry Officer acknowledges the importance of the rollout of the Smart Meter Network. However, in relation to alternative sites, the Officer does not consider that the reasons given for the dismissal of sites 3, 4 and 8 (Supporting Statement, Para 3.7, pages 12-15) have been given sufficient due diligence. The Officer has noted that with a project extension to 2024, greater effort should be given to exploring opportunities for mast sharing as emphasised in the NNPF.

In the absence of mast sharing proving feasible, the Officer has noted that other potentially less harmful locations should be considered. The Officer has noted that, in-line with the advice provided to the applicant prior to submission of the application, the NNPA would welcome the opportunity to meet with the applicant, local community representatives and the MOD (as a local landowner with potentially suitable structures to accommodate the antenna), to seek to identify a less visually intrusive location. The Officer has also expressed disappointment that the applicant did not contact the LPA when the original site selection visit was undertaken, whilst also querying whether this process may actually have been undertaken by means of a desk study rather than a visit to the site. The Landscape and Forestry Officers reasons for objecting (impact on landscape character / lack of due diligence in consideration of alternative sites) have been mirrored in the objections received from local residents as well as the Parish Council.

While the applicant has again stressed in an e-mail dated 21st February 2020 that an extensive survey of alternative sites was undertaken prior to deciding on the current location, based on the



assessment within the Supporting Statement (Paged 13-14), the LPA remain concerned that the reason for discounting some sites (particularly 3 and 4) which would be significantly less harmful in terms of landscape impact, has been for reasons of ease and time, rather than as the result of any meaningful investigation in to the likelihood of these sites providing a realistic alternative to the chosen site.

A number of representations have queried the level of public consultation which has been undertaken. It is not clear whether the concerns relate to the level of pre-application consultation undertaken by the applicant or the statutory consultation undertaken by the LPA. In relation to the level of consultation undertaken by the LPA, in accordance with Section A.3 (6)(d) i) and ii) of the T&CP (GPDO) (Amendment)(No.2) Order 2016, the application was advertised by means of a site notice as well as letters sent to the nearest neighbouring residential properties. The LPA are therefore satisfied that the level of public consultation is both appropriate and in accordance with legislative requirements.

In relation to the level of pre-application consultation undertaken by the applicant, in an e-mail dated 21st February 2020 in response to the comments raised by objectors, the applicant has stated that *'it is not considered that insufficient engagement was undertaken'*. While the LPA have no comment on the level of pre-application consultation undertaken, given the objections received from local residents and the Parish Council and also based on the LPA's comments to the applicant at the pre-application stage, it does not appear that the comments provided to the applicant at the pre-application stage have been used in any meaningful way to inform final scheme design.

Concerns have also been raised by the local community over potential emissions and the impact on human health of the proposal. The applicant has however submitted a completed *'Declaration of Conformity with Public RF Exposure Guidelines'* form confirming that the equipment is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines. This self-certification is in accordance with Paragraph 115 (c) of the NPPF. Paragraph 116 of the NPPF is clear that LPA's should not set health safeguards different from the International Commission guidelines for public exposure and as such, in light of the completed declaration, the LPA are satisfied that the proposals meet relevant guidelines in relation to public health.

A number of the public representations have also raised concerns in relation to the mast being a visual distraction to motorists, potentially increasing the risk of traffic accidents. While noting the concerns, vertical structures close to the highway are a common feature (street lights / electricity poles etc.) and it is not considered that the provision of a mast would have an undue negative impact on highway safety. This is in the context where NCC Highways have been consulted on the proposals. While they have requested further information relating to the means by which the mast will be affixed to the concrete base and the location of parking for maintenance vehicles, they have not raised any concerns in relation to the mast being a distraction to users of the highway or impairing the visibility of users of the site joining or leaving the A68.



Conclusion

The application relates to the provision of an approximate 9.5m high (including antenna) smart metering mast in a prominent roadside location along the A68 within the village of Rochester. By virtue of its height and location, being poorly related to existing structures within the village, the proposed mast would have a significant detrimental effect upon the landscape character, setting and views associated with the village of Rochester and for users of the A68, this road being a key transport routes through Northumberland National Park. As Northern Powergrid are currently undertaking a programme of works to underground the existing overhead wire clutter in Rochester, the provision of a new vertical structure in such a prominent location would at least in part negate the benefits to local landscape character achieved through the undergrounding works.

Furthermore it is not considered that the applicant has provided compelling evidence of the need for the mast to be located in such a prominent, visually intrusive location, with alternative, potentially less harmful sites having been given minimal consideration prior to discounting. As there are alternative, potentially less harmful sites available for the mast, it is considered that any public benefits achieved by the scheme would not outweigh the harm to the landscape character of this part of the National Park.

On the basis of the above, it is considered that the proposals are contrary to the requirements of Core Strategy policies 1, 3, 20 and 28 and paragraphs 113 and 172 of the NPPF. The proposals are also considered to be contrary to the requirements of emerging policies ST1, ST2, DM1 and DM11 of the NNPLP. Therefore control is to be exercised over the siting and design of the proposal.

Recommendation

That prior approval is required and refused.

1. The mast is located in a prominent roadside location along the A68 within the village of Rochester. By virtue of its height and location, being poorly related to existing structures within the village, the proposed mast would have a significant detrimental effect upon the landscape character, setting and views associated with the village of Rochester and for users of the A68, this road being a key transport routes through Northumberland National Park. The proposals are therefore contrary to the requirements of Core Strategy policies 1, 3, 20 and 28, policies ST1, ST2, DM1 and DM11 of the emerging Northumberland National Park Local Plan and paragraphs 113 and 172 of the NPPF.
2. The applicant has failed to provide compelling evidence of the need for the mast to be located in such a prominent, visually intrusive location, with alternative, potentially less harmful sites having been given minimal consideration prior to discounting. As there are alternative, potentially less harmful sites available for the mast, it is considered that any public benefits achieved by the scheme would not outweigh the harm to the landscape character of this part of the National Park. The proposals are therefore contrary to the requirements of Core Strategy policies 1, 3, 20 and 28, policies ST1, ST2, DM1 and DM11



of the emerging Northumberland National Park Local Plan and paragraphs 113 and 172 of the NPPF.

Background Papers

Application File 20NP0007
EIA Screening Report

	Signature	Date
Planning Officer	<u>C Godfrey</u>	<u>02/03/2020</u>
Head of Development Management	<u>S Buylla</u>	<u>02/03/2020</u>