

From: [Robert Mayhew](#)
To: [Colin Godfrey](#)
Cc: [DC Consultation](#)
Date: 15 April 2020 23:25:25
Attachments: [Elsdon WiFi Mast application.jpg](#)

Colin,

Further to your request for an appropriate colour for the mast structure identified in Application 20NP0015, I will point you to two documents, namely,

- [Scottish Natural Heritage \(SNH\) Siting and Design Guidelines for Mobile Telecommunications Masts](#), and
- [The Code of Best Practice on Mobile Network Development in England](#).

The latter document document has been developed and is owned by a working group comprising: Arqiva; English Heritage; the Mobile Operators Association; National Parks England; and the Planning Officers Society.

In this latter document on page 23 it states that “In all circumstances, the sensitivity to context of the proposed development should be considered. In particular, the following general design principles should be regarded as important considerations in respect of telecommunications development; including: Choice of suitable designs, materials, finishes and colours to produce a harmonious development and to minimise contrast between equipment and its surroundings.”

On page 32 of the SNH guidance the subject of colour is addressed and in general, one should:-

- “Use a consistent colour scheme for all component structures of the radio base station. Ensure that equipment finishes and colours do not vary and result in visual confusion.”
- “In skylining situations, masts should generally be light grey in colour”.
- “Green paint finishes rarely succeed in matching the greens of nature and colour selection should reflect surrounding shades in a neutral fashion rather than attempt to mimic these”.
- “Any paint finish employed should be matt to reduce reflectivity”.

In the case of the 12.3m. streetwork pole and antennas at Elsdon, since these structures will be predominantly viewed against a backdrop of the Northumberland sky when seen from the key receptor sites of the B6341 county road as you cross the Elsdon Burn in an Easterly Direction and also when using the gated minor county road to Wiskershiel and Hudspeth Farms, then I would advocate a light grey matt finish say [RAL 7035](#) / (BS 5252 00 A 03).

I trust that this provides you with the additional information that you require but if you have any further questions do not hesitate to come back to me.

Regards.

Robert Mayhew

From: Robert Mayhew
Sent: 09 April 2020 09:42
To: DC Consultation

Cc: Colin Godfrey

Subject: Planning Application Consultation 20NP0015 Elsdon Village Hall, Elsdon, Northumberland, NE19 1AB

Application Reference Number : 20NP0015

Proposed Development : Installation of 12.3 metre streetworks pole and associated infrastructure, including omni antenna, GPS antenna and 3G antenna to total height of 13.8 metres at Elsdon Village Hall, Elsdon, Northumberland, NE19 1AB

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.

Firstly, having read the statement of Support for this application I would welcome some clarity from the applicant with respect to some of the statements made within this document, including:-

- a) On page 2, the applicant, Arqiva, states that they have been appointed by The Department of Energy and Climate Change, (DECC). For clarity, the 15 year contract to undertake this project was awarded by DECC in [September 2013](#) 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 currently being undertaken on behalf of BEIS these days if DECC does not exist? I stand to be corrected though.
- b) I also note on page 2 of the Statement of Support, the applicant suggests that the UK Government's aim is for all homes and small businesses to have smart meters installed by 31st December 2020. Again I understand that this was the original intention set by DECC but after a damning [National Audit Office report in 2018](#), and looking at [current progress](#), my understanding is that, the findings of a [Government consultation \(2019/09/16\)](#) are likely to conclude that this date is extended to [31st December 2024](#), although again I stand to be corrected.
- c) In paragraph 2.5 it is suggested that the UK Government has a target to reduce carbon emissions by 80% on 1990 levels by 2050. Clearly the applicant has overlooked the Government's current [net-zero by 2050](#) national target announced in June 2019? It is just a shame the applicant would appear to be using an out of date template for this application and, in my view, it demonstrates a lack of attention to detail, making me question the accuracy of the rest of the application.

It was also disappointing that, whilst the nature of the Wi-Fi mast may not come directly and the definition of mobile communications, the applicant Arqiva did not see fit to 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 identified. They are clearly aware of this joint accord since we have brought it to their attention with previous applications of a similar nature.

With respect to the landscape character, setting and visual effects of this proposed development the applicant should be aware that the former overhead mains electricity wire network has been undergrounded throughout the village of Elsdon by the local electricity distribution network company, Northern Powergrid. This work was 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' that includes 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 and potential impact of vertical structures is also identified in Statement of Environmental Opportunity No. 1, last bullet point, on page 17 of the [Northumberland Sandstone Hills 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 Otterburn and Elsdon Valley Landscape Character Area. The Northumberland National Park Local Development Framework, [Landscape Supplementary Planning Document](#), identifies Guidelines for Development for this area. Those thought pertinent to this application include:-

- 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;
- Any lighting should be kept to a minimum and installed effectively to protect dark skies.

I note that the applicant makes no reference to the National Landscape Character Area profiles nor to the Northumberland National Park Landscape Supplementary Planning Guidance and as such I can find no evidence that an appropriate landscape appraisal has been undertaken for this proposed development.

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.

As indicated in paragraph 3.6 of the Statement of Support, site sharing and the utilisation of existing structures to fulfil the requirements of this development has been considered and this approach is welcomed by the National Park Authority. If a suitable structure for sharing could be found this would clearly minimise the carbon footprint and environmental impact of the proposed work. The requirement for the applicant to look at the possibility of erecting apparatus on existing buildings, masts or other structures is highlighted in Policy 28 of the Northumberland National Park Core Strategy.

In fulfilling this requirement, I note the applicant has investigated and sought to utilise five existing streetworks monopoles as well as St Cuthbert's Church as identified in the table on page 12 and 13. I understand that these structures include four new LED street sight columns and one

20kV electricity line support pole, (see attachment). I have appraised the likely landscape/visual effect of attaching a 1.5 metre Skymast S.C3B-420 antenna to these structures and have come to the conclusion that whilst being lower in height, the nature of the structures means that they are more visually intrusive to the everyday views gained around the village. Three structures are located adjacent to the principal road route through the village, another one is in clear line of sight of several properties and the last, on the 20kV pole is set within the open landscape. Two of the locations are located in positions that would affect approach routes and gateways to the settlement of Elsdon. I am happy that the identified location, adjacent to the back of the village hall, which itself is not looked over by residential properties, is a reasonable location to site the equipment necessary to operate the smart meter network in Elsdon. It is unfortunate that it lies relatively low down in the landscape and thus necessitates the need for a 13.5 metre structure. However, I understand from paragraph 4.16 that this 13.5 metre mast is the lowest height mast that is technically able to deliver the smart metre network requirements that are required for the village of Elsdon.

With respect to the colour of the supporting monopole and antenna equipment, the principal receptor site for this structure would be the main road through the village, at a point just as you cross the Elsdon Burn heading in a easterly direction, at which point the mast would be viewed against the sky. A second receptor site would be the gated minor county road leading to Hudspeth and Whikersshield Farms, at which point the mast is likely to be viewed against the sky in either direction of travel. Thus in both cases an off-white/light grey mast ought to have the least visual effect when the structure is viewed from these locations. A dark colour would be more visually prominent when viewed against a blue or grey cloudy sky.

Finally, I note from the fourth paragraph on page four of the Statement of Support that the applicant informs The Authority that a pre-application consultation was undertaken in 2013. Do we have any record of that and if so what information was derived from that process?

In summing up, I have been disappointed with the attention to detail within this application but on balance, given the requirements for successful deployment of this infrastructure, and having appraised the landscape and visual effects associated with the application site and alternative 'shared use' structures, I do not wish to raise any objections.

As with all vertical structures of this nature, should this application be approved, I would recommend placing a condition within the decision notice requiring that this structure be taken down, removed and the site returned to its former state should the mast become redundant for a period of six months or more so as not to unnecessarily clutter the Elsdon skyline.

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
Head of Conservation
/ Landscape and Forestry Officer

Robert Mayhew, Head of Conservation
Tel: 01434 611539 (x277)

Mob: 07502 223320

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