



20th June 2016

Mrs Runacre
Planning Section
Dover District Council
White Cliffs Business Park
Dover
CT16 3PJ

Dear Mrs Runacre,

Application: DOV/16/00524: Land to the North of Kings End Farm, Richborough, CT13 9JH

Erection of a 305m high / 2.5m wide guyed communication mast (with 5no. 9m wide anti-twist frames at intervals above 140m) with 6no. 3.7m diameter dish antenna, 206sqm base compound enclosing associated equipment cabins and electric meter cabinets up to 2.5m in height (4.2m above ground level), 9no. guy stay compounds, stone access track, hard and soft landscaping and associated works

Justification

CPRE Kent believes that the applicant has not demonstrated that other technologies are not available to meet communications needs. Establishing the need for the mast will be important during evaluation of the planning balance when determining the application. An identified harm would be more difficult to justify if there are different ways of meeting the same communications objective. A mast of the size should not be permitted anywhere in East Kent unless it is demonstrably in the public interest, and the least harmful site has been identified. The case has not been made.

There are clear planning objections to this particular site (see landscape, heritage and ecology impacts below). It is therefore relevant and necessary to consider whether there are more appropriate sites elsewhere. Although the Planning Statement and the Technical Operation Report mention consideration of alternatives, it is not clear which alternatives were considered and why they were discarded. This is necessarily relevant to the decision. Indeed the similar and current application at Richborough Power Station is necessarily relevant to the decision.

It has not therefore not been demonstrated that the proposal, by necessity, should be sited in the location proposed. It is essential that a scheme of this size should make every effort to minimise its impact and site choice must of course be relevant.

The Planning Statement sets out search parameters at paragraph 3.9. It is of particular note that the search parameters did not include avoiding landscapes of historical, cultural or archaeological importance. Furthermore,

The Kent Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent, TN27 0AD Fax: 01233 714549 Email: info@cprekent.org.uk

Phone: 01233 714540 www.cprekent.org.uk

avoiding impacts on habitats and species of principal importance, and designated habitats, should also be relevant to the choice of site.

The consideration of alternatives is critical in this case and a key element of justifying harm. Weighing public benefits against that substantial harm (in the planning balance) would be inappropriate if that harm can be reduced on an alternative site. Of course this would need to have regard to site availability and deliverability.

Mast Sharing

The statements associated with the application do not indicate whether they have discussed mast sharing with other operators, with a view to reducing the numbers of masts proposed in this area. They commit to accommodating other users where possible, but do not appear to have communicated with a prospective alternative provider (such as Vigilant Global) also seeking a similar mast. In view of the scale of the proposal this would not be an unreasonable expectation. Questions should be asked such as:

Is New Line Learning Networks prepared to share the mast with competitors?

What structural changes, or changes to mast height, would be required if additional dish antennae were to be accommodated?

This point is key. It has not been demonstrated that there is a need for two masts of this scale. The proliferation of masts of this size should clearly be avoided where possible and that is in the public interest.

CPRE notes that The Planning Statement explains that it will use mast 'sharing' to improve local infrastructure (local telecommunications). CPRE disagrees with the justification set out at paragraph 7.56. A mast of this height and in this location is not necessary to sustain the rural economy, nor meet the needs of the community. This would be a negligible benefit in the overall planning balance.

Landscape and visual impact

The Ash Level Landscape Character Assessment makes the following notable statement: *'There is little built development, creating a predominantly horizontal landscape with little to interrupt the view or focus the eye'*. The proposed mast would clearly not protect or enhance the local and wider landscape character of this open and horizontal landscape. CPRE is of the view that it will have far-reaching and significant detrimental impact.

CPRE believes that this harm to the character and appearance of the landscape is a significant impact, reinforced by its relevance to nearby nationally important heritage assets, and Richborough Fort (and associated features) in particular. Indeed the Wantsum Channel itself is a landscape of historic, cultural and archaeological importance in its own right and it is inappropriate to assume that the harm to this landscape area is only relevant insofar as it relates to the cultural contribution of the landscape to the understanding of nearby heritage assets.

Impact on the views from Richborough Castle are also harmful and significant. CPRE disagrees with the following conclusion (para D8.7) in the Environmental Statement:

"These effects are not considered to be significant due to the visibility of other large scale buildings and infrastructure, the limited physical effects and the reversible nature of the effects on aesthetic and perceptual aspects. In relation to Richborough Castle, the slender nature of the mast means that whilst visible the proposed development would not affect visitors' ability to interpret the historic landform and strategic siting of the fort".

The proposed mast would clearly disrupt important views across this heritage landscape. The open nature of the landscape is important and the development would represent a substantial and unpleasant feature. The visibility of other buildings and infrastructure does not limit the significance of the harm to the setting of the Fort, since it will be nearer than other development, and of course, much taller. It is the view of CPRE that the mast, by virtue of its height and location, would have significant and harmful landscape impact over a wide area. Further, it is unlikely that 'using subtle and slimline materials and colour' will significantly mitigate impacts on landscape character.

As such, the proposal fails to satisfy Policy DM 16 (Landscape Character) of the Core Strategy, which states:

"Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if:

- i. *It is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or*
- ii. *It can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level”.*

This case cannot be made for this proposal. The impact is unacceptably harmful and it has not been justified. Other proposed vertical features, such as the Richborough Connection, would further compound this impact. Indeed the information submitted with the proposal does not seek to properly understand the visibility over long distances.

Heritage assets

The proposed development is likely to have a significant effect on the setting of the Roman site at Richborough. The site is designated as a Scheduled Ancient Monument and includes the Grade 1 listed Richborough Castle.

There are, of course, other historic landscape features in the locality, most notably the former Wantsum Channel which forms part of the setting of Richborough Fort. Views of this channel are prominent from the castle and are important in the understanding of the strategic siting of the castle. Correspondingly the mast will be visible from the Scheduled Monument and the listed Richborough Castle and would be clearly detrimental to the experience of visitors to the site and the interpretation of the landscape setting in particular. The harm to the setting of the fort, and the ability to appreciate it would be significant.

Furthermore, it is the view of CPRE that the Wantsum Channel is a heritage asset of value. It forms part of a historic and cultural landscape that makes a significant contribution to the understanding of the pattern of development in East Kent. The impact of the scheme on the landscape character of this area, which forms part of the setting of numerous heritage assets, would be substantial and harmful to its evidential, historic and aesthetic value and thereby its significance.

Ecological assets

The site is designated as a Local Wildlife Site with notable bird, invertebrate, mammal and reptile species. Golden Plover (an SPA species) is relevant, but there are numerous other Species of Principal Importance or otherwise notable. The risk of bird impacts is a significant concern of CPRE and this issue should be discussed in detail with Natural England, Kent Wildlife Trust and RSPB. An alternative site might lower this risk and this should be relevant to the alternative site assessment. Of course the lack of experience of this height of mast must make the impact on birds uncertain, and this is an important concern due the valuable migratory species overwintering in East Kent.

CPRE Kent must object to this application and submit that it is essential that the need for the mast is established, that the alternative site assessment is made available, that the two applications should not be considered in isolation, and that significant weight be given to the heritage, landscape and ecological harm likely to result from the development.

Yours sincerely,

Jillian Barr
Planner
CPRE Kent