SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Stonebridge Rd	Site Address:	Stonebridge Road Northfleet Gravesham Kent DA11 9DR
National Grid Reference:	E: 561700 N: 174514		
Site Ref:	33751	Site Type:	Macro

2. Pre-Application Check List - Site Selection (for New Sites only)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	
No evidence of a mast register and no developments in the search area shown when planning applications were searched		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why: No suitable alternatives were identified within the search area.		

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	02.07.25	
Was there pre-application contact:	Yes	**No**
Date of pre-application contact:		
Name of contact:		
Summary of outcome/Main issues raised: No response to date.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	**Green**

The site was rated green. Despite the fact that the proposed site is a new development, it is a streetworks design located adjacent to a busy main road with screening provided by trees Consultations sent to the following on 2nd July 2025. Councillor Alison Williams Councillor Peter Brian Scollard Councillor Jo Hart Councillor Sharon Roots Councillor Matthew Fraser Moat Lauren Sullivan, MP No responses to date.

School/College

Location of site in relation to school/college *(include name of school/college):* There are no nearby schools.
Outline of consultation carried out with school/college *(include evidence of consultation):*
Summary of outcome/Main issues raised:

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?	Yes	**No**
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
Details of response:		

Developer's Notice

Copy of Developer's Notice enclosed?		Yes	
Date served:	23/07/2025 & 17/10/2025		

3.0 Proposed Development

The proposed site:

The application site is located around 600m to the south of the River Thames. To the west lies Swanscombe, Ebbsfleet valley is situated to the south-west and Northfleet is to the south. Around 100m to the south-west is Northfleet Railway Station.

The application site is designated as the Existing Old Northfleet Residential Area and located within the Northfleet Embankment and Swanscombe East Opportunity Area as designated under the Gravesham Local Plan Core Strategy.

The immediate area is of mixed-use to the immediate south of the site is the B2175 (Stonebridge Rd). This runs north-west to south-east. The proposed mast would be located on a grass verge to the immediate north of the of this highway. To the east of the proposed mast on the grass verge is a large mature tree.

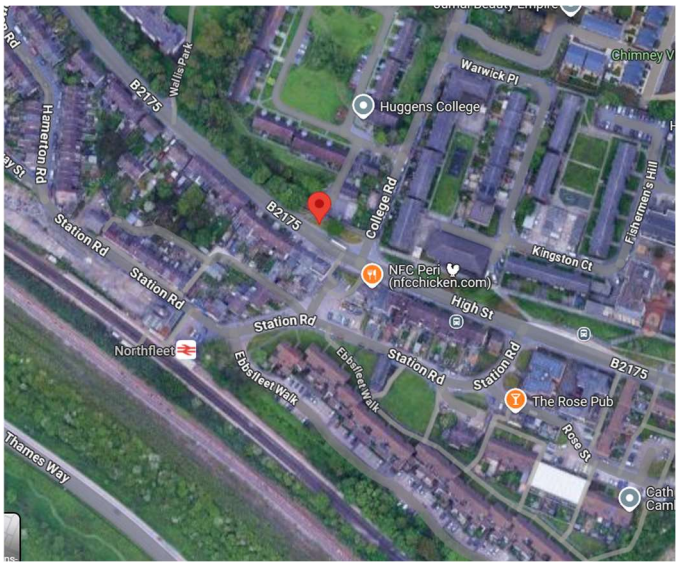
To the north of the application site lies Huggens College. The nearest residential dwellings to the east of the site are the block of flats on the corner of Stonebridge Road and College Road. These are approximately 40m from the application site. To the south of the site is a row of mixed-use units including commercial and residential.

The nearest dwelling would be approximately 16m from the proposed mast. There would not be any unacceptable impact on the residential amenity of these dwellings due to distance and orientation.

The mast will be located immediately adjacent to an existing large mature tree (more than 11m high), with an 8m lamppost immediately to the east of the tree. Further to the north-west lining the highway is a deep bank of existing mature trees. These, in addition to the other existing street furniture, would ensure that the proposed mast would not appear as an unacceptable overbearing feature within the street scene.

The proposal is to replace a former rooftop site that can no longer be used.

Location Plan



View to the north-west (the proposed mast would be on the right)

View to the south-east (the proposed mast would be on the left)

Stonebridge Rd
Google
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Planning History

20250789|Application for determination pursuant to Part 16 Class A of the Town and Country Planning (General Permitted Development) Order 2015, as amended, as to whether prior approval is required for proposed telecommunications installation of a 20m streetworks mast

Validated 04/08/2025
Application refused 26/09/2025

"The application has not been accompanied by evidence required under paragraph A.3 (1) and therefore fails to meet the requirement set out in paragraph A.3 (5) (c). The landowner, Kent County Council Highways, have not been consulted by the applicant and no evidence has been provided to the Local Planning Authority to confirm that they were notified of the

development. As such, the application has not met the requirement set out in paragraph A.3 (5), by virtue of no evidence to satisfy paragraph A.3 (1), and therefore Prior Approval is required and refused."

Type of Structure *(e.g. tower, mast, etc.):* Mast	
Description: Installation of a 20m monopole with 9 no. antenna apertures, 2 no. 300mm transmission dishes, 5 no. equipment cabinets and development ancillary thereto.	
Overall Height: 20.2m	
Height of existing building *(where applicable):*	
Equipment Housing:	
Length:	
Width:	
Height:	
Materials *(as applicable):*	
Tower/mast etc – type of material and external colour:	**As per attached drawings**
Equipment housing – type of material and external colour:	**As per attached drawings**

Reasons for choice of design:

The development has been specifically designed for the site in question, considering the existing environment and streetscene. The development will be seen in the context of the area with an adjacent large tree and lamppost and a deep bank of mature trees lining the highway to the north-west of the site. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. It is necessary for the height of the structure to ensure that interference is avoided, the topography of the landscape does not have an unacceptable impact upon mobile signal quality and that the structure is able to support the antenna and other apparatus. It also needs to be tall enough to satisfy ICNIRP standards, relative to the surrounding land uses, in the case, the site location is not located within any restrictive allocations and therefore should be supported.

It is accepted that the proposal will be taller than the existing adjacent trees and street furniture, however, it will be seen in the context of the current character of the locality and will bring positive benefits to the local community, as well as local residents and visitors to and through the area.

Network Planners have indicated that the position of the new cell is the ideal location to provide optimum coverage to both enhance the capacity of the current network and also bring advanced technologies and also bring advanced technologies to the area. It should

be noted that the new technologies and increase to the existing network will provide high-quality and high-speed critical communications infrastructure, this is essential for economic growth and to improve a critical service as illustrated in the NPPF.

The requirement for the mast is to support the existing network and has been designed in order to provide network coverage and capacity where demand is located. During normal times network capacity is within city centres and places of work. Due to the recent public health crisis and the subsequent shifts in working patterns and practices, demand has shifted to different locations and there is far greater demand and thus requirement for increased capacity.

4.0 Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) International Commission on Non-Ionizing Radiation Protection public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference. The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.	**Yes**	No

Frequency	To be provided on request
Modulation characteristics[1]	To be provided on request

[1] The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.
The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, MBNL operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of MBNL's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request
Height of antenna (m above ground level)	20.2m

5.0 Technical Justification

Background:

As part of MBNL's continued network improvement program they wish to enhance the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

Base stations use radio signals to connect mobile devices and phones to the network, enabling people to send and receive; calls, texts, emails, pictures, web, TV and downloads. Without base stations, mobiles devices and phones will not work.

Many other everyday items also use radio signals to send and receive information, such as television and radio broadcasting equipment and two-way radio communications. Base stations are connected to each other and telephone exchange buildings by cables or wireless technology such as microwave dishes, to create the network. The area each base station covers is called a "cell". Each cell overlaps with its neighbouring cells to create a continuous network. The size and shape of each cell is determined by the features of the surrounding area, such as buildings, trees and hills which can block signals. When people travel between cells, the signal is transferred between base stations without a break in service. Each base station covers a certain area only and can only handle a limited number of calls at once. As mobile phones and devices become more popular, more base stations are needed to ensure continuous coverage.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications

development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

All MBNL's installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Site Search Area:

Site[2]	Site Name and address	Reason for not choosing[3]
4 RT	Ebbsfleet Court	Unsuitable due to whole roof solar panel array, meaning the roof is at capacity and any taller equipment would impact energy collection due to shadowing
5 SW	The Hive Verge	Discounted due to apparent buried services, steep verge incline meaning a mast could not be built in this location and site line of residential properties.
6 SW	Grove Road	Discounted due to buried services, meaning a mast could not be built in this location
7 GF	Grove Road	Discounted due to buried services, meaning a mast could not be built in this location
8 SW	High Street	Discounted as pavement is too narrow to accommodate required equipment and maintain highway safety for pedestrians.
9 RT	Wallis Park 2	Discounted on grounds of unworkable build access
10 SW	Stonebridge Road 2	Discounted due to remoteness from search area and radio planning/coverage concerns

[2] *ETS - Existing Telecomm site, ES - Existing Structure, RT - Roof Top, GF - Greenfield*
[3] SP - Site Provider, RD - Redevelopment Not Possible, T - Technical Difficulties, P – Planning
O – Other

Additional relevant information

Planning Policy Assessment

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with policies of the adopted Statutory Development Plan, unless material considerations indicate otherwise.

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) was published in December 2024 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 85 the NPPF advises…." *Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development."* In terms of supporting a prosperous rural economy paragraph 85…" *The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."* This approach provides a sustainable solution to the need to enhance telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support *"Advanced, high quality and reliable communications infrastructure"* ensuring that it is *"essential to economic growth and social wellbeing"*. It advises that *"planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) and full fibre broadband connections."* Paragraph 120 states" *the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate."* The proposal would allow for the maintenance and the future improvement of the mobile network covering the area.

Paragraph 121 continues" *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. They should ensure that:*

a) they have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and

b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services.

The NPPF places a high importance on the need to upgrade England's digital communication network and the promotion of economic growth. Key policy references are:

Paragraph 119 emphasises that *"high quality and reliable communications infrastructure is essential for economic growth and social well-being"* and that *"planning policies and decisions should support the expansion of electronic communications networks."*

Paragraph 120 advises that the re-use of existing masts and buildings should be encouraged and equipment should be well designed and camouflaged where possible.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for MBNL to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

The current proposal is for an important investment in upgrading the communications infrastructure in the area. Full consideration has been given to alternatives, including existing masts and the proposal is considered to provide the best option in terms of meeting the technical requirements in a location with limited local impacts.

Improving the communications infrastructure is critical to supporting sustainable economic growth. Para 83 of the NPPF notes that significant weight should be placed on the need to support economic growth and productivity. Para 83 states that planning decisions *"should address and recognise the locational requirements of different sectors"* which will include the needs of the locational requirements of digital communications infrastructure.

The proposal supports better communication services for local residents and visitors to and through the area, it supports economic growth, choice and is part of the new technology the Government wishes to encourage and support. Importantly, it also reduces the need to travel, particularly at peak-periods, and allows working from home to take place. It therefore constitutes sustainable development.

Furthermore, government guidance published during the COVID-19 pandemic supports telecommunications as a critical service. The applicant would like to highlight this in relation to this installation in its importance to support the existing network infrastructure.

<u>Local Planning Policy</u>

The statutory development plan for the area is comprised of:

Gravesham Local Plan Core Strategy 2014

Policy CS01: Sustainable Development

4.1.6 Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

4.1.7 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

4.1.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*

- *Specific policies in that Framework indicate that development should be restricted.*

The proposal supports better communication services for local residents and visitors to and through the area. It also supports economic growth in the area, including the adjacent commercial units. The application site is located within a designated opportunity area, therefore it is essential that the area is covered by a fast and reliable mobile network.

Importantly, it also reduces the need to travel, particularly at peak-periods, and allows working from home. It therefore constitutes sustainable development with regards to the NPPF guidelines. In this case it is therefore contended that this policy has been complied with.

Policy CS02: Scale and Distribution of Development

4.2.24 The development strategy for the Borough is to retain and improve the existing stock of housing and suitable employment land and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028, and at least 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) during the plan period.

4.2.25 Development will be distributed throughout the Borough as follows: around 3,890 new dwellings and around 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East; Gravesend Riverside East and North East Gravesend; Ebbsfleet (Gravesham) and Gravesend Town Centre and on land at the Coldharbour Road Key Site; around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt.

4.2.26 The strategy prioritises development in the urban area as a sustainable location for development. This will be achieved by:

•Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas;

•The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;

•Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and

•Bringing forward a range of suitable sites in other parts of the urban area for residential and employment

•development, including Land at Coldharbour Road Key Site.

4.2.27 In the rural area, development will be supported within those rural settlements

This policy prioritises development in the urban area as a sustainable location for development. The proposed mast would be located in a mixed-use area and contribute to a fast and reliable network covering the adjacent college, residential dwellings and the adjacent commercial units. In these circumstances it is contended that this policy has been complied with.

Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area

4.4.28 The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design.

4.4.29 Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, transport and access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line.

4.4.30 The Swanscombe Peninsula East Riverside Industrial Area, Kimberly Clark Site and Imperial Business Estate will be retained in employment use. The Council will support proposals which expand and support their operation.

4.4.31 The Council will support the regeneration for residential and employment uses of the Grove Road and Lower Ebbsfleet Area taking into account the ground conditions and existing uses.

4.4.32 Development of the Key Sites will lead to the provision of around 980 dwellings and around 133,500 sq m gross employment floorspace. Development on the Key Sites will be in accordance with the principles set out below.

Land East of Grove Road and Robin's Creek Key Site (within sub-area 1.3)

4.4.33 This will provide a residentially led mixed use development with the potential to create around 200 dwellings. Such development will be expected to: improve and enhance Robin's Creek and the Ebbsfleet stream; improve greenspace; and reduce heavy commercial traffic and parking on Grove Road.

Old Northfleet Residential Extension Key Site (sub-area 1.4)

4.4.34 This will provide a residential development of around 530 dwellings, open space, an extension and improvements to the Hive local centre and provision of community facilities.

Northfleet Cement Works Regeneration Area Key Site (sub-area 1.5)

4.4.35 This will provide an employment development of around 46,000 sq m gross new employment floorspace comprising business, industrial, and storage and distribution facilities (use classes B1, B2 and B8) and a Bulk Aggregates Import Terminal. Such development will be required to satisfactorily relocate Bevan's War Memorial.

Northfleet Embankment East Regeneration Area Key Site (sub-area 1.8)

4.4.36 This will provide an employment led development of around 87,550 sq m gross new employment floorspace including a major industrial and warehousing development (use classes B1, B2 and B8) with multimodal access, subject to masterplanning and overcoming identified constraints. It will also provide around 250 dwellings at the eastern end of the site which will reinforce the existing adjacent residential areas. A buffer zone comprising open space, landscaping and business development (use class B1) will be required between the residential development and the industrial and warehousing development. Such development should seek to restore the listed remains of Rosherville Pier and maintain an east-west route for

public transport and general traffic accessing the Imperial Business and Retail Estate and Gravesend town centre.

Proposals for the Key Site will be required to retain Red Lion Wharf for commercial river based use that is appropriate to context, subject to capacity for the transhipment of minerals being maintained through appropriate alternative provision off-site.

The application site is located in The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area and is therefore earmarked for redevelopment. It is therefore especially important that the area is serviced by a fast and reliable mobile network to encourage business development in this area.

It is also essential for residents and visitors to and through the area to have access to a fast and reliable network.

In these circumstances it is contended that this policy has been complied with.

Policy CS07: Economy, Employment and Skills

5.1.29 In conjunction with the private sector and its regeneration partners, the Council will seek to secure the delivery of around 186,490 sq m gross new employment floorspace over the plan period focusing on the following:
• a major new B1/office employment centre as part of a wider mixed use sustainable development of Ebbsfleet;
• office, industrial and warehousing facilities on Key Sites in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area;
• office development in Gravesend Town Centre as well as retail, culture and leisure (see Policy CS05);
• office, industrial and warehousing development on Key Sites in the Gravesend Riverside East and North East Gravesend Opportunity Area; and
• office and light industrial development in the form of an enterprise centre/incubation space on greenfield land South of Coldharbour Road, Northfleet.

5.1.30 Proposed office development, in addition to that allocated elsewhere within this plan, will be directed in the first instance to Gravesend Town Centre, and then to edge of centre locations, including sites within 500 metres walking distance of Gravesend Railway Station and Ebbsfleet Station, in accordance with the NPPF sequential test. Only if suitable sites are unavailable in these locations, will consideration be given to out of centre locations.

5.1.31 Proposals for office development exceeding 2,500 sq m floorspace which lie outside Gravesend Town Centre and are not identified elsewhere in this Core Strategy, will be subject to an impact assessment in line with the NPPF.

5.1.32 The Council will work with its partners and landowners at Swanscombe Peninsula East to deliver additional employment-led mixed use development subject to a comprehensive masterplan approach.

5.1.33 In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high

quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices and the changing economic needs of the Borough.

5.1.34 Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy or where:
• the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or
• the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or
• the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.

5.1.35 Development proposals facilitating the expansion of river-related employment will be supported, particularly where these involve the use of the river for transport and or provide specialist training or other facilities intended to support the continued use of the River Thames as a major commercial waterway.

5.1.36 The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5), or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

5.1.37 The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units where it is compatible with national policies for protecting the Green Belt and where it accords with policies in this plan, in particular relating to Green Infrastructure.

5.1.38 The Council will work with its regeneration partners to enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above. Support will be given to upgrading educational and training facilities and major development projects will be expected to contribute (either directly or through other agencies) towards the delivery of skills training, the promotion of apprenticeships and work placements.

This policy supports development within urban areas as sustainable locations for growth. The proposed mast would be situated in a mixed-use area and would ensure

a fast and reliable network serving the nearby college, residential properties, and adjacent commercial units.

The application site is located in The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area and is therefore earmarked for redevelopment. It is therefore especially important that the area is serviced by a fast and reliable mobile network to encourage business development in this area.

Given these factors, it is considered that the proposal aligns with the aims of the policy.

Policy CS10: Physical and Social Infrastructure

5.4.11 Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available.

5.4.12 Where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure.

The proposed infrastructure is necessary in order to replace a decommissioned site and therefore maintain the existing network coverage. Telecommunications infrastructure is needed for residents, visitors and businesses to have a reliable digital network. The proposed mast is located in an appropriate urban area. It is therefore contended that this policy has been complied with.

Policy CS19: Development and Design Principles

5.15.14 New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

• *Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;*

• New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;
• New development will be located, designed and constructed to:
• safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
• avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
• not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
• The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
• New development will be designed in an inclusive way to be accessible to all members of the community;
• New development will provide appropriate levels of private and public amenity space;
• New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
• Car parking will be well related to the development it serves;
• New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
• New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
• The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
• New development will incorporate appropriate facilities for the storage and recycling of waste; and
• The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

The proposal is for a streetworks style mast and adjacent cabinets. The proposed structure has been designed to be as slimline as possible. The structure would be intentionally located adjacent to a large, mature existing tree and a deep bank of adjacent trees to the north-west. Furthermore there is an existing lamppost in the immediate streetscene. This would ensure that there would not be any unacceptable detrimental impact on the existing streetscene and the proposal would not appear as an overbearing feature.

Whilst there are nearby residential dwellings, there would not be any unacceptable impact on the amenity of these properties due to orientation and distance.

It is therefore contended that this policy has been complied with.

CONCLUSION

There is a requirement for MBNL to provide advanced telecommunications technologies to this urban area. Network planners have identified a need for an enhanced installation and the proposed development will address this identified need and continued customer demands.

The social and economic benefits of providing reliable and high-quality mobile connections support growth in productivity, efficiency and labour force. It is contended that the positive benefits to the modernisation of this mobile network service will outweigh any minor loss of visual amenity to the surrounding area.

National planning policy is to facilitate the growth of new and existing telecommunications systems, and operators have obligations to meet customer demands for improved quality of service. This application explains the technical need for the installation to provide improved customer service.

Furthermore, telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This upgraded cell will allow telecommunications infrastructure providers MBNL to ensure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services specifically at this critical time.

In terms of siting and design, it is considered that the proposal responds well to the character and appearance of the local environment and will not have an unacceptable adverse impact on the application site or the surrounding area. The design is of a high standard, and will not detract significantly from the existing visual and environmental character of the area. The benefits to residents and visitors to the area far outweigh any potential perceived negative impacts. In all these circumstances it is concluded that there are no policy or other objections that would warrant the refusal of planning permission and accordingly permission should be granted for the proposed development.

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Position	**Acquisition Surveyor**	**Company**	**Beacon Communications** **For and on behalf of MBNL**