

Delegated Report

Approval of Details Application

Application no:	20230914
Location:	Port Of London Authority London River House Royal Pier Road Gravesend
Description:	Application for the approval of condition 6 attached to planning permission reference number 20221294 relating to full details of the size and appearance of the communications tower.
Applicant:	Mr Michael Atkins
Site Visit Date:	27 January 2023 (for application ref. 20221294 & 20221295)

Planning permission was granted for demolition of an external stairwell, construction of a new single storey roof space, removal and relocation of the radar mast, internal refurbishment, improvements to the exterior facades and new landscaping to provide a level access to London River House and the PCC and enhancements to the existing link between the PCC and Grade II listed Royal Terrace Pier and repaving works in the forecourt area of the listed pier on 20 April 2023 under planning application reference 20231294. This was subject to a number of conditions including condition no. 6 which this application seeks to discharge.

Consultations

Historic England

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

GBC Conservation Officer

Has concerns and with insufficient information on the location and height concludes that this will result in further harm to the setting of the listed pier and adjacent buildings as well as the conservation area. Previously raised concern regarding the design of the replacement tower, which should be sited as far away from the pier as possible, preferably where the existing smaller aerial is located. Rationalising the proliferation of aerals may offer a justification but the applicant needs to make a justification on how they will address the mar caused by the taller aerial tower and this may be through better design and rationalising the number of protrusions.

No response from:

- Thurrock Borough Council

Analysis

Condition 6 is:

6. *Prior to the new communications tower being installed on Alexandra House full details of the size and appearance of the communications tower shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. Within 15 months of the new communications tower being in operation the existing communications tower on the Port Control Centre (PCC) building shall be removed in its entirety and shall not be reinstated or relocated elsewhere in the application site at any time thereafter.*

Reason: *In order to protect the visual amenities of the building and the surrounding area, the setting of the adjacent Grade II Listed Royal Terrace Pier and the character and appearance of the Riverside Conservation Area in accordance with Policies CS19 and CS20 Gravesham Local Plan Core Strategy (September 2014) and Saved Policies TC2 and TC3 of the Gravesham Local Plan First Review 1994.*

The information submitted in pursuance of this condition is:

- Application form; and
- Drawing no. ALH C 2036 – Proposed Rooftop Communications Tower;
- Drawing no. ALR/C2037 – Proposed Rooftop Tower Elevations of Gravesend Complex South Elevation;
- Drawing no. ALR/C/2038 – Proposed Rooftop Tower Elevations of Gravesend Complex North Elevation; and
- E-mail from agent dated 03/10/2023.

The existing communications tower is located on top of the PCC building and is pylon type steel structural frame with access ladder. The communications tower is a vitally important functional element of the PLA's occupation of the site. Application ref. 20221294 included removal of the existing tower from the PCC building and to position a new tower on Alexandra House to the east. It was stated in the Design & Access Statement that:

The proposed comms tower location is on top of 'Alex' house. This keeps the complicated tech away from the PCC, ensuring the sleek silhouette of the remodelled building is kept legible from the river and town. The highest point of the tower will remain at 30.57m above sea level. The new tower on 'Alex' house will be maximum 4.75m wide at its base.

The design of the tower is to be developed further and signed off through planning condition subject to approval. For purposes of this DAS and drawing information the tower location and size has been represented as per the existing giving the maximum height and size parameters in awareness this will be reduced following further detailed design.

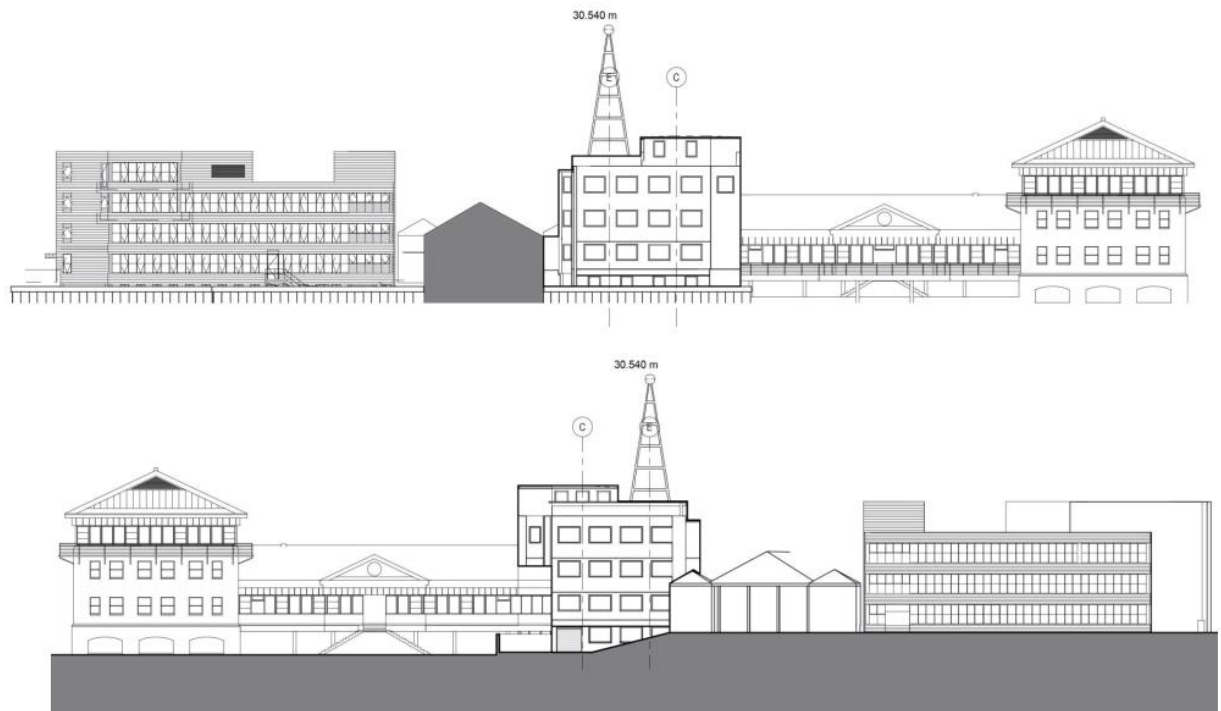
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Condition 6 was therefore attached in order to secure full details of the size and appearance of the new communications tower.

For ease of reference the existing tower, the permitted tower (with a representation of the existing tower used) and the proposed detail in this application are shown below:

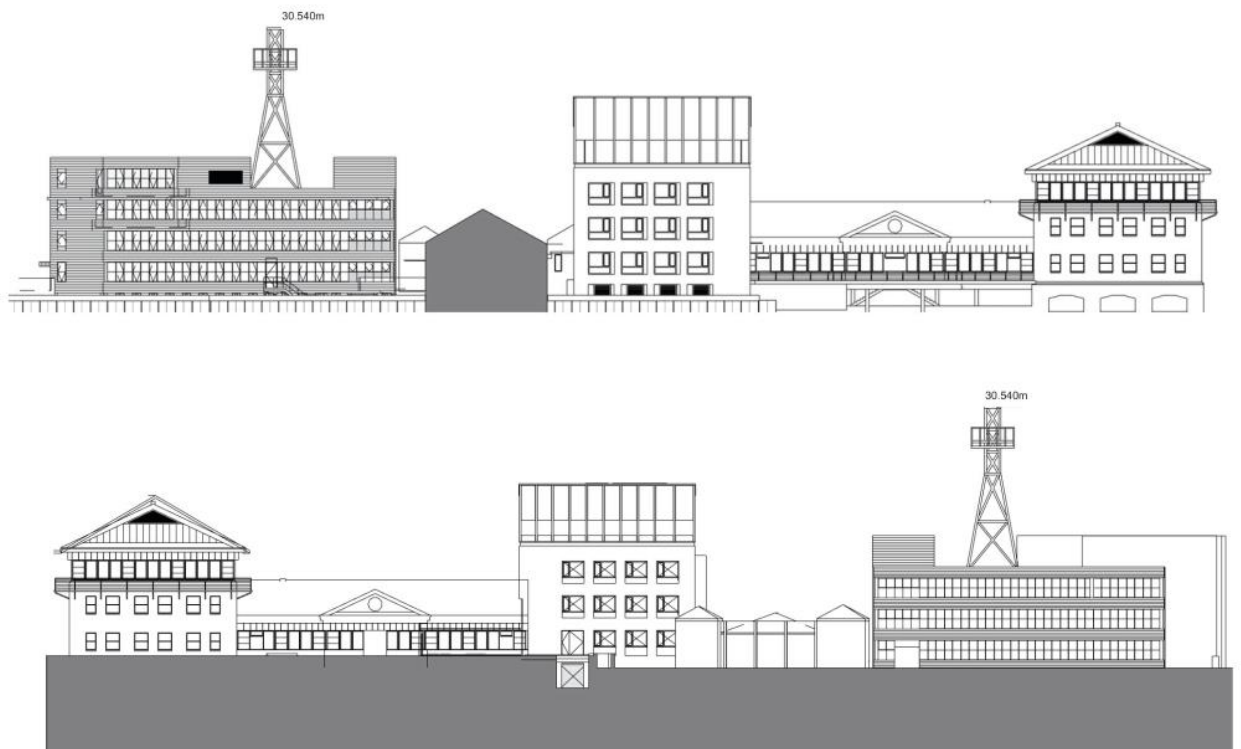
Existing

Comms Mast – Existing Location

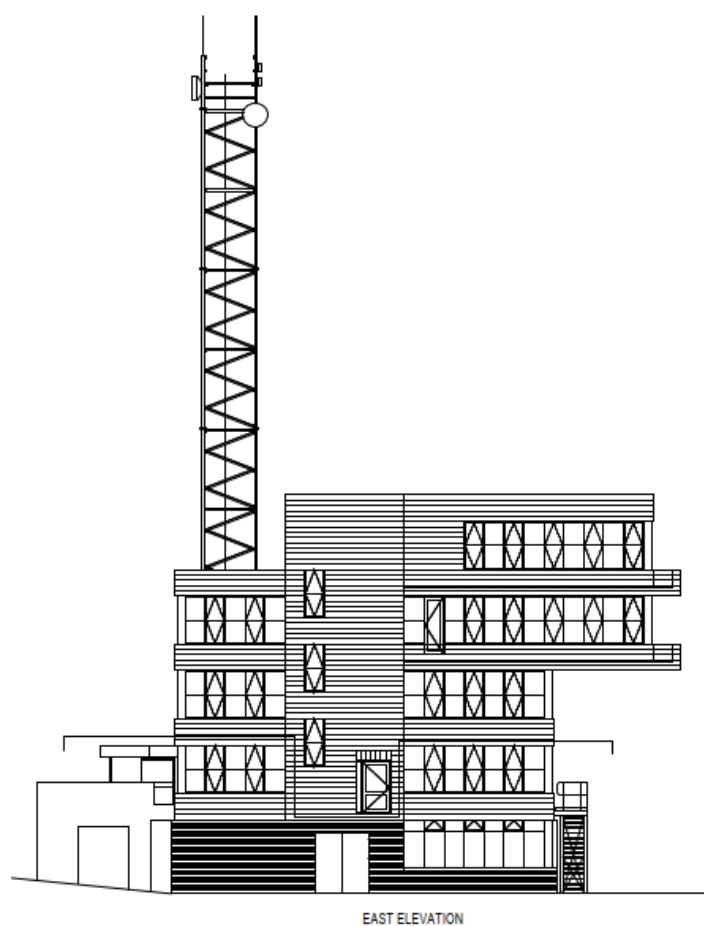
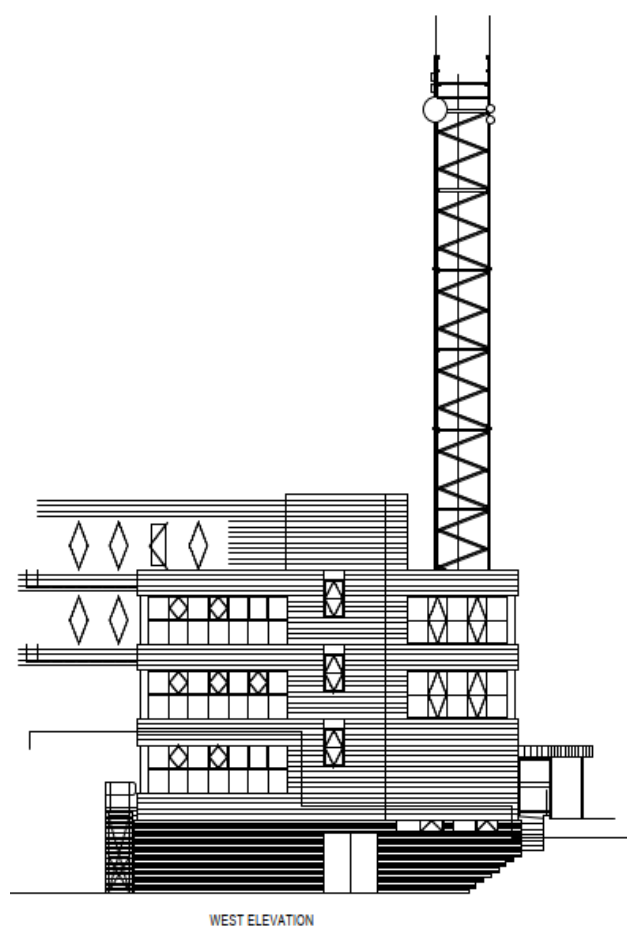
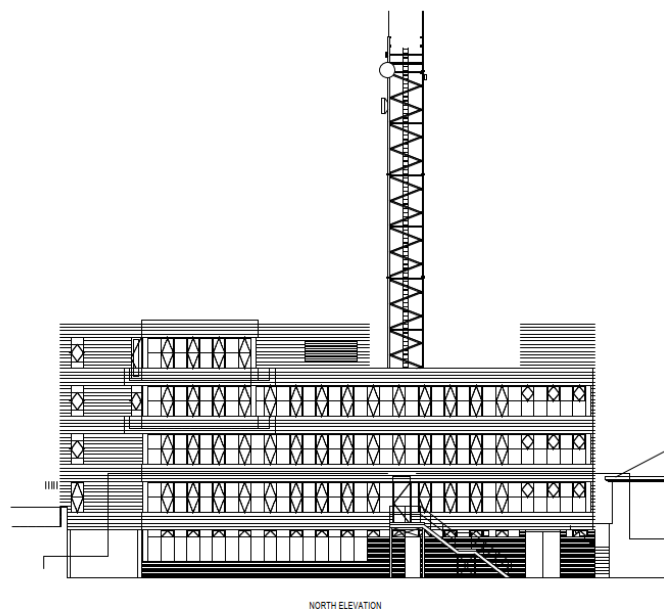
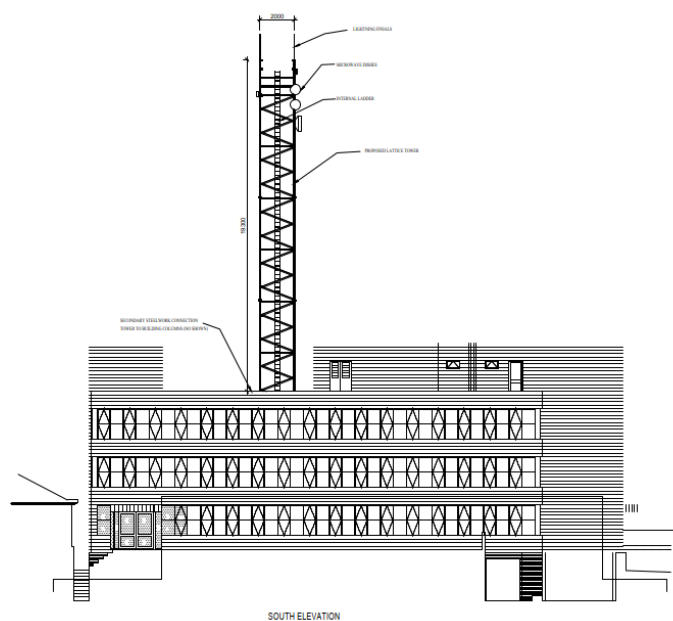


Permitted scheme (with a representation of the existing tower used as the final size and design were unknown and conditioned)

Comms Mast – Proposed Location



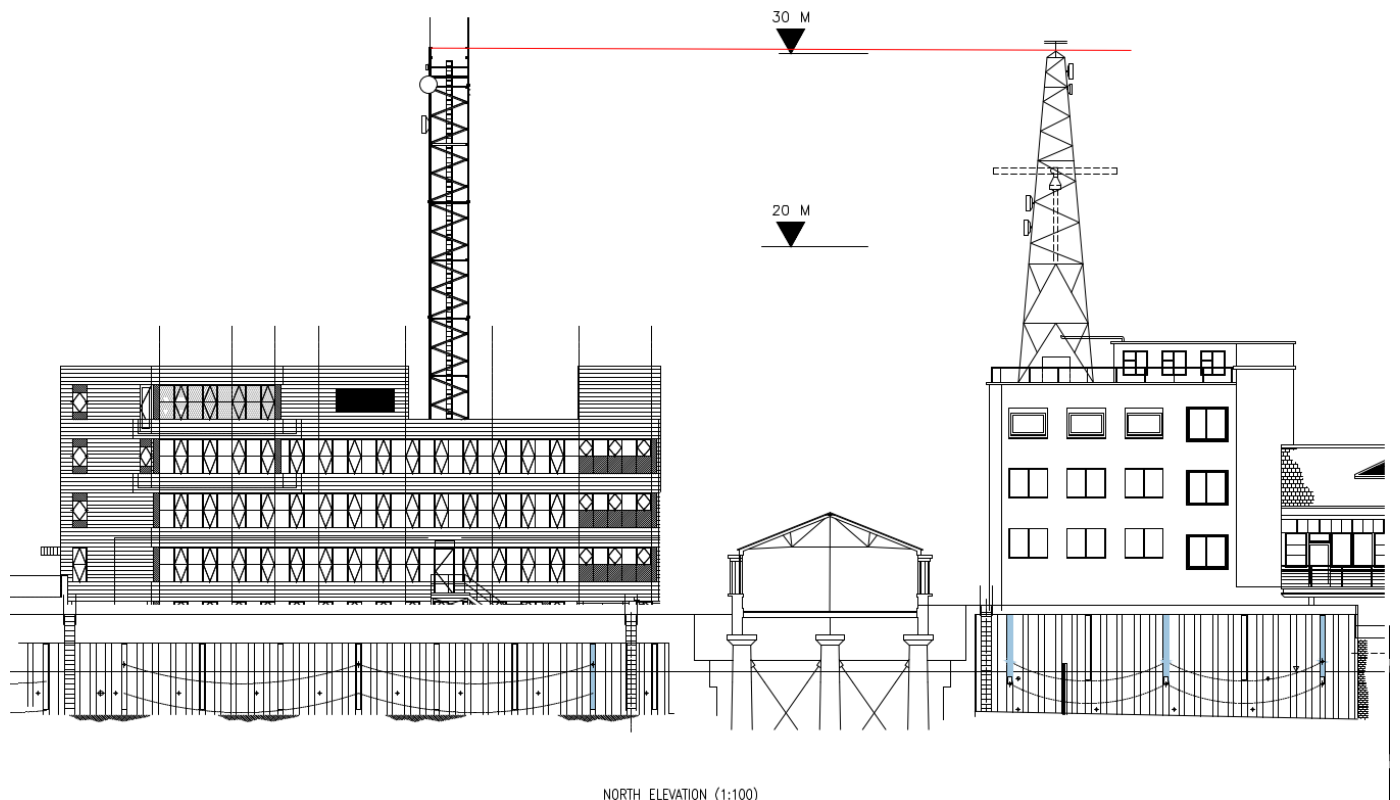
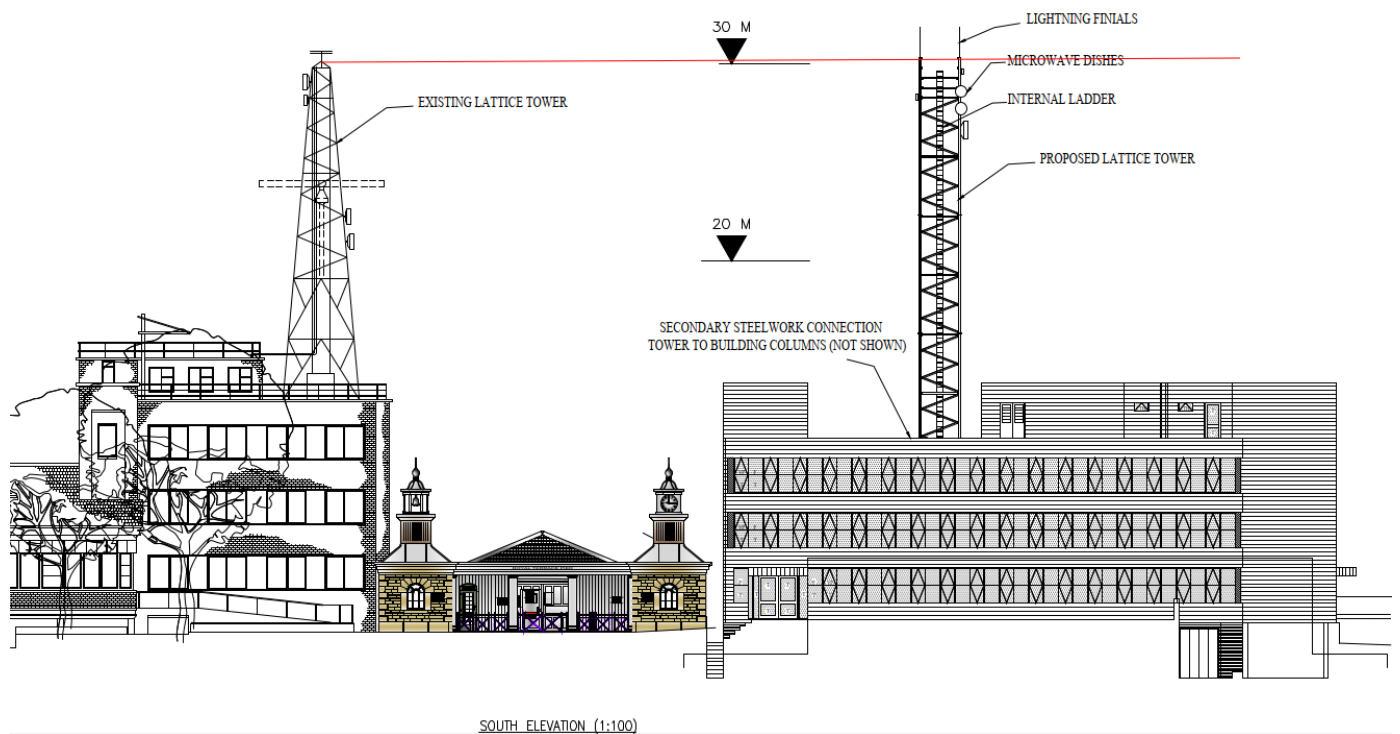
Proposed tower (subject of this approval of details application)



The total height of the tower would be 19.3m (20.7m when the lighting finials on the very top are also included). On looking at the existing plans on the original application there were concerns that the proposed tower would be taller than the existing tower. The agent was therefore asked to provide further clarification on the height of the tower and its height in comparison to the existing tower, the reason for its design and to provide context by showing north and south elevation streetscene drawings to include the PCC building, Royal Terrace Pier and Alexandra House in order for a full assessment to be able to be made including the impact on the setting of the listed Royal Terrace Pier and the Riverside Conservation Area. The agent was also asked to clarify why the tower had been sited on the particular part of the roof of

Alexandra House and whether it could be located further east as per the Conservation Officer's comments to move it away from the listed Royal Terrace Pier.

The agent has now provided north and south elevation streetscene drawings which allows for a comparison of the existing and proposed tower. These are as follows:



These drawings show that the height of the existing tower would be identical to the existing tower in terms of the height of the tower structure itself. In respect of the finials on top of the tower, the lighting finials on top of the proposed tower would be slightly higher than the finial on the top of the existing tower but this would only be by 1.1m in height. The agent has advised that the height of the tower has been determined to be as close to the existing tower as possible to maintain line of sight to other existing radar sites along the river which it is stated is an essential requirement as part of the PLA's Vessel Traffic Service (VTS). The agent advises that the tower has been proposed where it has as this is the part of the roof that is

positioned over the structural columns inside Alexandra House and the rest of the roof does not have the capacity to take the load of the tower as there are no columns available further east due to the additional floor and cantilever on Alexandra House. The agent highlights that the proposed tower would be positioned further away from the Royal Terrace Pier than the existing tower. In respect of design the agent has advised that the tower has been designed as it has to be slender as possible whilst maintaining structural integrity for the intended load, the intention behind this being to reduce possible visual impact of the tower compared to a wider structure.

In summary, as the height of the proposed main tower structure (excluding the finials) would be the same as the existing tower this means the height is considered acceptable. The lighting finials on top of the proposed tower would be slightly taller than the finials on the top of the existing tower but this would only be by a small amount (1.1m). It is considered there is sufficient justification for why the tower has been located where it has and why it cannot be moved further east away from the listed Royal Terrace Pier. The lattice tower design lacks any real finesse but the agent has explained the reason for it's design is to reduce the visual impact of the tower by making it as slender as possible compared to the existing pylon style structure. Overall it is considered that upon receiving the further contextual information and justification from the agent, sufficient information has now been submitted.

On the basis of the submitted information the proposed tower on Alexandra House is considered acceptable in respect of its size and design such that it would not impact on the character and appearance of the area, the setting of the listed Royal Terrace Pier or the Riverside Conservation Area any more than the current situation with the existing tower on the PCC building. As such it is considered the proposed details are compliant with Policies CS19 and CS20 (LPCS), saved Policies TC2 and TC3 (LPFR) and sections 12 and 16 of the NPPF (2023) and condition 6 can be discharged.

Recommendation:

Approval of details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Miss Faye Hobbs
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	6th November 2023	Dated:	06 November 2023