

**SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	R B Hammond	Site Address:	May West Industrial Estate May Avenue Gravesend Kent DA11 8RU
NGR:	E: 563626 N: 173235		
Site Ref Number:	51532	Site Type:	Macro Lift and Shift Replacement

2. Check List

Site Selection

Was Gravesham Borough Council mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA – Gravesham Borough Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	19 th July 2024	
Name of contact	The Director of Planning – via Email.	
Summary of outcome/Main issues raised:		
At the time of this application no comments have been received, in respect to the proposals.		

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	GREEN
Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues. Further consultation has also been carried out with local councillors for the local area – [REDACTED], Cecil Road Primary and Nursery School, Copperfield Academy and Mayfield Grammar School who were issued a letter, drawings, and a site detail sheet. The site has been given a GREEN rating under the Traffic Light Model 'TLR'. (The model assesses each proposal to be rated against standard criteria by the operator according to its likely sensitivity in terms of environmental, planning and community considerations.) The Green rating reflects the requirement to contact both local Councillors and the local educational establishment.	
Summary of outcome: Councillor [REDACTED] expressed concerns regarding the height of the proposed mast at 20m. However, the minimum height is the minimum required to guarantee that the area receives the best possible coverage, given that the new proposed mast would bring new 5G coverage. It operates at different frequencies to the existing mast, and therefore needs to be this height. Further to this, the significant difference in height stems from the ICNIRP exclusion area, it needs to be above the roof of the re-developed property immediately adjoining to get the exclusion area above the new flats. This was discussed with the Councillor, but no further comments were made by the Councillor or other parties.	

School/College

Location of site in relation to school/college:
Three educational establishments within a 500m radius have been identified within the vicinity of our proposed development. This includes Cecil Road Primary and Nursery School, approximately 260m from the site. Copperfield Academy, approximately 300m from the site and Mayfield Grammar School approximately 450m from the site.
Outline of consultation carried out with school/college:
The above schools were consulted with a letter, drawings, and a site detail sheet.
Summary of outcome/Main issues raised:
To the best of our knowledge, no responses have been received at the time of submission.

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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No

Developer’s Notice

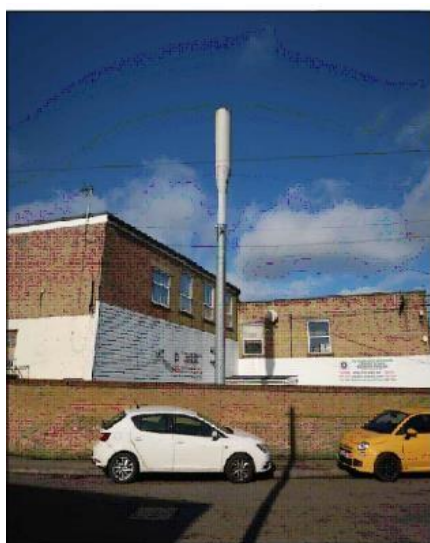
Copy of Developer’s Notice enclosed?	Yes	
Date served:	15 th August 2024	

3. Proposed Development

The proposed site: This proposal comprises a short relocation of an existing mast due to the site provider's requirement for the building's redevelopment (application: PP-06462494). The removal of the existing mast has been mandated by the service of a Notice to Quit (NTQ) the current location from the landowner. This redevelopment provides an opportunity to enhance the radio network coverage for the area by adding 5G services, which, for optimal operation, requires an increase in the height of the mast proposed. The current site is being replaced at R B Hammond, May West Industrial Estate, May Avenue, Gravesend, Kent, DA11 8RU. The proposed new structure comprises a 20m high Valmont streetworks pole with 3No. proposed antennas at 16.64m, 3No. proposed antennas at 18.224m and 3No. proposed antennas at 19.519m, 2No. 300m dishes at 13.615m, and 2No. GPS nodes at the top of the headframe, with associated equipment. Works at ground level include the installation of 6 cabinets and ancillary apparatus, as shown on the attached drawings, to provide the local area with 2G/4G and 5G network services. The old mast and cabinets will be removed, as part of the proposal. The existing site can be seen below, Figure 1, which needs to be removed. The proposed location of the telecommunications site can be seen in the photographs and photomontage at Figure 2.
Figure 1: An image to show the locations of the existing & proposed replacement telecommunication site, image taken from Google Images.



Figure 2: Images to show the existing and proposed monopole and equipment.





The proposed location is approximately 10 metres from the existing telecommunications site, as shown in Figure 1. The site is located in a semi-commercial area that includes residential properties nearby. We believe this has been placed in the least visually invasive location possible while retaining the coverage that will be lost and providing 5G service. The close proximity of the existing and proposed sites means that any additional visual impact created by the new mast will be mitigated by the visual gain arising from the removal of the existing site apparatus. The site must be moved slightly due to redevelopment plans for the land-owner's building. Ultimately, without this planned proposal, network coverage will be reduced, with consequential effects on the ability to access the emergency services and limit the local community's ability to use the connectivity provided by mobile phone/internet access-based services.

It is also important to acknowledge that the proposed monopole, has been kept to a minimum height whilst providing the best network coverage solution for the area. The development has been positioned near users in order to ensure an appropriate quality of service (coverage and capacity). The nearest residential properties are located on the west of the site at Lansdown Place. The marginal additional impact of the development would be outweighed by the significant benefits of the proposal.

There are three main elements to a radio base station; the cabin or cabinets and their security fencing which contain the equipment used to generate the radio signals, the supporting structure (the mast) that supports the antennas at the right height to provide appropriate coverage and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links to connect this site to others and the wider network either by fibre cabling or by dish antennas, power source (meter cabinet or generator where a REC supply cannot be utilised), feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as "development ancillary to" the base station.

The technical details of this proposal are illustrated within the enclosed application design drawings: - 957123_GVM004_51532_DA0182_M001. It is considered that the siting and design of the proposed communications equipment is justified by the benefits the replacement radio coverage will maintain and is the least sensitive option within the area that would meet EE and H3Gs technical requirements, whilst minimising any environmental impact. The nature of 5G means the equipment and antennas operate at different frequencies to the existing antennas, and so need a certain amount of physical separation from them. This is one factor determining the height for the proposed antennas and the taller monopole compared to the existing site.

Type of Structure:		Monopole
Description:		
A new 20m high Valmont streetworks pole with 3No. proposed antennas at 16.64m, 3No. proposed antennas at 18.224m and 3No. proposed antennas at 19.519m, 2No. 300m dishes at 13.615m, and 2No. GPS nodes at the top of the headframe, with associated equipment. Works at ground level include the installation of 6 cabinets and ancillary apparatus. The full detailed works can be seen on the attached drawings.		
Overall Height:		20m Valmont Climbable Monopole
Height of existing building		N/A
Equipment Housing:		
Length:		See drawings
Width:		See drawings
Height:		See drawings
Materials		
Tower/mast etc. - type of material and external colour:		Galvanised steel
Equipment housing - type of material and external colour:		RAL7035 / Steel

Reasons for choice of design:
The use of a monopole installation is to minimise any visual impact upon this area, whilst being able to facilitate 2G/4G and 5G capacity and coverage to the surrounding area. The site has also been designed to provide 5G coverage for both EE and H3G without any further changes to the external appearance of the development. This will guarantee that the community will be at the forefront of the next technological service development being introduced. The height of the monopole also provides the optimal coverage to the area, that will be lost from the existing site and placing the apparatus any lower would result in the signal proportion being restricted.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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, under normal circumstances, unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.	Yes	
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5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for H3G and EE and maintain the existing 4G connectivity, improving service in and around the surrounding area. The cell search areas for 5G are extremely constrained. In general, it would not be feasible to site the installation too far from the target locale, originally designed around the Lift and Shift site.

6. Site Selection Process – alternative sites considered and not chosen.

Discounted Options
In accordance with the sequential approach outlined in the National Planning Policy Framework (NPPF), the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground- based installations are investigated. This sequential approach is outlined below: a) Mast and Site Sharing b) Existing Buildings Structures c) Ground Based Installations In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to use any existing telecommunication structures, where they represent the optimum environmental solution have been considered. The Mast Data register is examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 118:

“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.

As this site requires a move due to planned development on the existing location. We have not searched for other locations as yet on the assumption that we will be able to implement this proposed upgraded scheme to give the local population coverage and capacity to use their telecoms devices. Ultimately consideration was given to utilising the existing telecoms location as per the government guidance.

7. Additional Relevant Information

Background to the Proposal

EE and H3G support the Government's ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the Walsall area and specifically in this instance, to provide 5G coverage in and around this area of Gravesend.

Modern mobile phone base stations operate on a low output power and accordingly, are better located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a local community, which aligns with the local development plan.

DEVELOPMENT PLAN POLICY:

Development plan considerations have a special significance in law. Section 70(2) of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

In dealing with such an application the authority shall have regard to —

- a. the provisions of the development plan, so far as material to the application, ...*
- c. and other material considerations*

LOCAL PLANNING POLICY:

The relevant local development plan for the site is the Gravesham Local Plan October 2020. Policy INF 6: Telecommunications and Section 6.4 Telecommunications Infrastructure encourages and is in favour of this critical infrastructure, it emphasises the importance of visual impact and minimising the number of sites. We believe our proposal fully complies with the policy and its aims, as this is a replacement mast, to fill the gap in coverage that will be lost from the removal of the NTQ site.

6.4. Telecommunications Infrastructure

Background

- 6.4.1. The telecommunications industry is ever-changing to improve the speed and coverage of internet connections. The Council supports the provision of improved infrastructure within the Borough through Local Plan Core Strategy Policy CS10.
- 6.4.2. Some forms of telecommunications development does not require planning permission and can be undertaken under permitted development rights. Even where planning permission is required, the Council is required under national policy to determine applications on planning grounds only. In particular consideration of issues relating to competition or need are precluded, and the Council is prevented from applying different health safeguards for public exposure from those set out by the International Commission¹⁹.
- 6.4.3. National policy also requires that Local Plans should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time. Full fibre connections to existing and new developments should be prioritised as the optimum solution.

Proposed Text

- 6.4.4. National planning policy requires local planning authorities to support the expansion of electronic communications networks, including telecommunications and high-speed broadband. At the same time, the number of masts and sites for such installations should be kept to a minimum consistent with the efficient operation of the network.
- 6.4.5. Telecommunications infrastructure is moving forward at a fast pace. The government's aim is to provide superfast broadband (speeds of 24Mbps or more) for at least 95% of UK premises and universal access to basic broadband (speeds of at least 2Mbps). In terms of wireless mobile technology, the current standard is 4G (fourth generation), but there is now a move towards 5G (fifth generation) which aims to deliver improved speeds and coverage when compared to 4G. This means that there is likely to be a continued demand for enhancing existing telecommunications infrastructure.
- 6.4.6. Core Strategy Policy CS10 supports the enhancement of existing and the provision of new physical and social infrastructure, including telecommunications. At the same time, Core Strategy Policy CS12 seeks to conserve, restore and enhance overall landscape character

and valued landscapes, whilst Policy CS19 aims to conserve and enhance the character of the local built, historic and natural environment.

- 6.4.7. The Council is also under a range of statutory duties to have special regard to protect the heritage interest of listed buildings and conservation areas, as well as according great weight to the purpose of conserving and enhancing the natural beauty of the Kent Downs AoNB. There is potential, therefore, for policies to pull in different directions, and this tension has to be resolved at the application stage.
- 6.4.8. The situation is made more complex because there are wide-ranging permitted development rights for the installation of masts and other telecommunications equipment. However, there are greater restrictions on the development which can take place without permission in Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and Conservation Areas.
- 6.4.9. National policy also requires that Local Plans should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time²⁰. To ensure that this is taken into account at the application stage, the policy that follows requires that proposals for major development be accompanied by a statement setting out how this will be achieved on a site by site basis²¹.

Proposed Policy INF 6: Telecommunications

- 6.4.10. Telecommunications equipment²², including masts, boxes and satellite dishes, will only be permitted where:
- evidence has been provided to demonstrate there is no reasonable possibility of sharing facilities or installing the equipment on an existing mast or structure so as to minimise the need for such development and visual clutter;
 - they are sited and designed so as not to have an unacceptable impact on landscape, townscape or the significance of heritage assets;
 - they do not have a detrimental effect upon the character or appearance of a building or area or the amenity of occupiers of surrounding properties;
 - they do not have an unacceptable adverse impact on biodiversity or nature conservation; and
 - it can be demonstrated that there is no interference with highway safety, the maintenance and operation of the Strategic Road Network²³ and there is adequate, safe provision for the parking of service vehicles.

- 6.4.11. A statement should also be provided to accompany any application for relevant telecommunications infrastructure detailing the outcome of consultations with organisations with an interest in the proposed development in accordance with national policy and certifying that the cumulative exposure of the installation, when operational, will not exceed International Commission guidelines on non-ionising radiation protection or other safety limits that may subsequently be imposed.
- 6.4.12. All applications for major development proposals, including residential or commercial floorspace should be accompanied by a statement setting out how high-quality digital telecommunications infrastructure will be provided to the development and how this will be delivered. The ability to upgrade such provision overtime should also be assessed.

The policy and local plan recognise that the telecommunications industry is rapidly expanding, and Gravesham encourages this growth and intends to evolve accordingly. As a result, this proposal is essential for allowing this to occur in the most beneficial way possible, by replacing the current site with improved coverage.

- Extract taken form the Gravesham Local Plan

NATIONAL PLANNING POLICY:

National Planning Policy Framework

The National Planning Policy Framework was revised in December 2023 and sets out the

government's policies for England and how these are expected to be applied.

The most recent NPPF demonstrates continued government support for telecommunications infrastructure and recognises its importance:

118. Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. 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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

119. 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.

120. 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.

121. Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and b) for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or c) for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure 34 and a statement that self-certifies that, when operational, International Commission guidelines will be met.

122. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including:

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts above, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure.

Conclusion

We consider that the development is compliant with the Gravesham Local Plan and National Planning Policy Framework to promote telecommunications, this proposal is extremely important to ensure there is no loss of mobile connectivity in the area.

This statement and the other accompanying material have demonstrated that the proposal is in accordance with Local Development Plan policy and NPPF. In particular, it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting planning permission applies. We believe this proposed development to install this site, to replace the existing site nearby is fully compliant with the local plan and request the LPA to approve this telecommunication installation in order to maintain services and provide 5G to the Gravesham area.

Contact Details

Name: (Agent)		Telephone:	
Operator:	MBNL	Fax no:	N/A
Address:	Dot Surveying Office 52 Zenith House Highlands Road B90 4PD	Email Address:	
Signed:		Date:	27th August 2024
Position:	Planner	Company:	Dot Surveying Ltd
		(on behalf of above operator)	

