

Supporting Statement for a
Prior Approval Application

At

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Gravesend
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EXISTING SITE PHOTO

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Rev	Originator	Approved	Date
0	Name	Name	Day/Month/Year
1	Martin Brown		March 2025
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1.0 Introduction

This Planning Supporting Statement has been prepared by Telent on behalf of the Wireless Infrastructure Group (WIG). The statement has been prepared in support of the application to remove the existing 25m high tower and replace it with a new tower with an increased height of 30m AGL (as described in more detail within Section 2.1 of this statement below) along with ancillary development thereto at Northfleet Water Treatment Works, Thames Way, Gravesend, Kent, DA11 8HN.

Planning permission was previously sought and approved (planning Ref: 20200819) at this site for the same development, with the decision issued by the Local Planning Authority granting permission on the 20th October 2020. In addition to this, a S73 application (planning Ref: 20211067) was then made on the 26th August 2021, which was an application for a variation of Condition 2 attached to the original permission for a minor amendment to the design of the mast previously approved, and which was subsequently approved by the Local Planning Authority on the 27th October 2021. However, on the decision notice issued it highlighted the following in respect of timescales for implementation:

1. The development to which this permission relates must be begun not later than 13 October 2023

Reason: In pursuance of section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

As a result, the permission for both the original application as well as that of the S73 application (both of which could have been implemented) has now expired, meaning that a new application is now required for the proposal.

While the previous application was made his application is made under the Development Management Procedure Order (2015), as a result of changes to the permitted development rights for telecommunications operators since the original application, the proposal would now be permitted development and as such this application is now made under the General Permitted Development

(England) Order 2015, as amended (the GDPO). The statement sets out the most relevant considerations in respect of the proposed development.

1.1 About Wireless Infrastructure Group

WIG is an independent provider of wireless infrastructure and Code Operator, working alongside most of the telecommunication service operators (all of whom are also Electronic Communications Code ('Code') Operators). The company was launched in 2006 and is head-quartered in Bellshill, Lanarkshire. WIG is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in rural areas.

WIG does not operate a retail network of its own and instead builds and operates wholesale infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. The four MNOs, together with over 100 other smaller networks, use our infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

WIG operates over 2,000 communications towers across the UK with over 50% located in rural areas. In England, WIG's rural communication towers support an average of over four networks each, enabling transformational levels of connectivity for the communities they serve. International consultancy Ernst & Young highlighted in a recent report that the independent sector "can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services". Ernst & Young further noted that the sector has "a proven track-record in sharing towers with multiple network operators" and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators.

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the tower is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

1.2 The importance of mobile connectivity

The ability to access mobile data and voice services is an integral part of modern life. Mobile devices are relied upon by consumers and businesses. Mobile connectivity is no longer seen as a luxury: the ability to make calls, access the internet and receive e-mail and text is seen as a necessity. Businesses, large and small, need mobile connectivity to operate effectively and to compete in an increasingly global market. In an emergency, the public rely upon mobile devices to call for help and the emergency services rely upon mobile services to respond.

1.3 National Support for Modern Communications

There is significant UK Government support for the upgrading of existing 2G, 3G and 4G mobile coverage and delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra-Fast Broadband Mobile Connectivity**', sets out how upgraded mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. It is essential that the planning system looks to support and facilitate new base station installations that would provide this upgraded coverage whereby there is no opportunity to upgrade any existing site, such as that proposed, in order to meet the Government's Digital Strategy. In addition, modern connectivity will be essential to help the Government meet its wider sustainability and climate change targets.

1.4 UK government policy on mobile infrastructure deployment

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go". DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O2 (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not spots.
- Changes to the Permitted Development rights afforded to communications code operators to allow new networks to be rolled-out more efficiently.
- Changes to the Electronic Communications Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

1.5 Shared Access – The Benefits of Mobile Technology

Mobile phones and other similar communication devices are ubiquitous both for business and personal use. Mobile connectivity is now about fast, secure access to the internet anywhere. People and businesses are increasingly choosing to access the internet using a mobile device, and the numbers doing so are growing, as ownership of internet-enabled devices rises.

Smartphones are integral to people's lives as mobile devices supporting a growing range of functions from communication to navigation, to use as principle sources of news media, cameras, diaries and numerous other functions.

Overall, 94% of adults personally own/use a mobile phone with 52.4 million 4G mobile subscriptions. The proportion of adults in the UK with a smartphone has now reached 76% (as of 2017), with 18% of adults living in a mobile phone only home. Increasing coverage and take-up of higher speed 4G services is driving data use. The average volume of data consumed per subscriber per month is now 1.9GB.



Economic Benefits

Modern communications in all of their different and emerging forms, including mobile communications, help maintain and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications. These benefits include:

- Improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications that helps them maintain and attract new business and service contracts in a responsive and competitive manner.
- Improve coverage over transport and infrastructure networks which improves the ability to work on the move and improve economic efficiency



Environmental Benefits

Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development

such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.



Social Benefits

Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. These improvements manifest themselves in a number of ways as illustrated by the following examples:

- People are now more likely to access the internet using a mobile connection than they are to have just a landline or to access the web through a fixed connection.
- Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school projects or apply to university; to manage their bank account and pay bills; to apply for a job; or to buy groceries.
- Most local authorities' services are now available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour.
- Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

2.0 Proposed Development

2.1 Site and Proposed Development

The application site is located within the grounds of the existing Water Treatment Works, adjacent to its eastern boundary, and comprises an existing 25m high lattice tower with associated antenna and equipment (see planning history below) within an existing compound. The proposed equipment upgrading and replacement in this instance is to an existing and established base station site, which has been a long established feature in the landscape setting and whereby permission was previously sought and approved for the replacement of this existing 25m mast with a new 30m mast (in keeping with what is proposed again here).

The site location (and surrounding area) is shown in the image below by way of a yellow star for context.



Image 1: Existing/Proposed Site Location

The extent of the existing Treatment Works is located to the west of the site. Further to the west (circa 800m) is Ebbsfleet International Station. To the south of the Treatment Works (circa 200m from the application site) there are residential properties forming part of the Springhead Quarter Master Plan development site. To the east of the site is the Springhead Enterprise Park. Immediately to the north of the site is the A226 (Thames Way), and beyond this is Sawyer's Lake. An image of the site is shown below.



Image 2: Existing site/equipment

As stated previously, the proposal would see removal of the existing 25m high tower and replacement with a new 30m high tower along with ancillary development thereto, in keeping with the details previously assessed and approved by the LPA. The proposal would also see an enlargement of the existing site compound of around 7.5m x 7.5m. The drawings submitted with this planning application provide further details regarding the specific location, design and material specifications of the equipment.

The proposed tower would host multiple operators, who require this larger tower due to the height of the surrounding clutter between the site location and the cell coverage area, in order to provide

improved coverage to existing and new customers. The tower would continue to provide 2G, 3G and 4G coverage for customers within this area providing them with mobile, voice, text and data services. The ability of the site to host telecommunications equipment for multiple operators ensures that the number of masts needed within the locale are kept to a minimum.

2.2 Application History

On searching the Council's online planning search, the below applications can be found on searching the Council's online planning search.

- 20200819 - Replacement of existing 25m height mast with a new 30m high mast, together with development ancillary there to at the existing telecommunications facility.
Permitted 20 October 2020
- 20211067 - Application for variation of condition 2 attached to planning permission reference no. 20200819 for replacement of existing 25m height mast with a new 30m high mast, together with development ancillary there to at the telecommunications facility to allow amendment to the proposed equipment.
Permitted 27 October 2021

NOTE: The proposal would be largely in keeping with the details already assessed approved under the above application, which were never implemented and as such the original permission, as well as the amendment, have elapsed.

2.3 Alternative Site Assessment

Paragraph 120 of The National Planning Policy Framework, in which the Government's supportive stance towards developing high-quality communications infrastructure is laid out, states that "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."

As the proposal would see the removal of the existing 25m tower and replacement with a new taller tower 30m in height, it is considered that the proposal is for works at an established telecommunications site and not for the development of a new site, thus the consideration of alternative sites is not appropriate in this instance. As a result, it is therefore considered that the principle of telecommunications development at this location would represent an acceptable form of development, consistent with Government guidance which seeks to encourage the use of existing masts/sites, buildings and other structures for new electronic communications capability (including upgrading). Furthermore, the Council have previously supported the upgrading of telecommunications development at this site, and as such a search for alternative sites would not be required in this instance, consistent with the previous consideration of the Authority.

Furthermore, given that this proposal will utilise an existing lattice tower in order to minimise the spread of masts across the area, and that a similar proposal at the site was previously approved by the LPA but never implemented, there is no need for discounted options in this instance. This is consistent with Para 18 of the Code of Best Practice for Wireless Network Development in England, which states that;

*Site sharing and use of existing infrastructure: make use of existing structures, **sites** [emphasis added] and masts possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and **sites** [emphasis added] 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.*

Such matters in relation to siting are also addressed under para 25 of the Code, whereby it again highlights the weight given to utilising existing bases station sites as follows;

Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment.

In addition to the above, it should be noted that the applicant has examined its portfolio of sites in this area and determined that there are no other viable alternatives in the area which can be

upgraded to meet the specific technical requirement in this instance. The application site, therefore, still represents the only feasible option in this instance which allows the requirement to be met without the deployment of an additional site to host the size of tower that would be required in the locality. Additionally, as stated above a very similar proposal was previously approved by the LPA under, which was never implemented and as such time expired.

2.4 Technical Justification

Coverage Services

2G (GSM) allows for basic voice calls and text services. 2G operates using lower frequencies than 3G and 4G. These lower frequencies have longer wavelengths which are more resilient to physical obstructions and will, in general, cover larger geographical areas. This contributes to the fact that 2G coverage is often more commonly achieved in rural or remote areas than 3G or 4G.

3G (UMTS) is a more efficient technology than 2G for voice communications and also allows for data transmission as well as text services as mobile phones, computers, and other portable electronic devices access the internet wirelessly.

4G (LTE, the acronym used for 'Long Term Evolution') supports mixed data, voice, video and messaging traffic and offers speeds of up to five times faster than 3G, enabling network users with 4G devices to benefit from ultra-fast internet browsing, video streaming, gaming, e-mail and downloads.

5G is the next generation of mobile technology. It is likely to be deployed as an intricate patchwork of technologies, including advanced LTE, Wi-fi and New Radio, and will utilise a range of spectrum frequencies including re-farmed existing bands, new bands (below 6 GHz) and mmWave spectrum.

3.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

3.1 General Policies

National Planning Policy Framework (2024)

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF is pro – development with a *'presumption in favour of sustainable development' seen as a golden thread, running through both plan making and decision taking*. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum;
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites as and when applicable;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;

The NPPF as a whole is aimed at encouraging a more positive approach to town planning. While the NPPF builds environmental protection into the definition of sustainable development, there is also a very clear emphasis that local planning authorities should be looking for ways to help development come forward and not reject applications simply on environmental grounds. This is emphasised in paragraph 10 of the NPPF, which states that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. The NPPF recognises that this is especially relevant where a development might have other significantly important benefits such as being essential to meet, for example, enhancement and improvement to existing communications infrastructure.

Paragraph 11 of the NPPF state that for ‘decision-making’, the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

As such, development proposals that accord with the provisions of the Development Plan should be approved without delay. In respect of this guidance, the following sections of this statement demonstrate that the proposed development accords fully will all relevant Development Plan and NPPF policies and, therefore, permission should be granted for the development. The importance of the proposed development in providing the upgrading and expansion of the existing communications network is clearly an important material planning consideration as it directly supports sustainability and is also precisely the type of new digital infrastructure that the NPPF is seeking to support. The development proposed is sited where the principle of telecommunications development has been long established and therefore accepted, and designed in a way that is consistent with that previously approved at the site and so should be acceptable in every respect.

However, for completeness we still highlight some of the key points within the NPPF as they help demonstrate why the application should be permitted:

Paragraph 7 advises that the purpose of the planning system is to contribute to the achievement of sustainable development. It then states that: *“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”* [our emphasis];

Paragraph 20 advises that strategic policies should *“make sufficient provision for ... telecommunications”* and that it should *“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”* (paragraph 86).

Paragraph 38, on “decision-making” states that authorities should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*.

The NPPF builds on the aspiration to build a strong, competitive economy. Paragraph 85 states: *‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking in to account both local business needs and wider opportunities for development. The approach taken, should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation.....’*

As previously highlighted, the NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA’s strategic policies must make sufficient provision for:

“b) infrastructure for transport, telecommunications (our emphasis), security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)”

Leading on from this, paragraph 119 states that *“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.....". This wording echoes guidance set out in previous versions of the NPPF. However, unlike the previous version it also includes the importance of reliable communications infrastructure for both economic growth and social well-being.

While supported, paragraph 120 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion [our emphasis].

Paragraph 123 retains the guidance set out in previous versions of the NPPF version and states that *"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 can be seen from the above, the NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical needs of developing and upgrading communications networks.

Public benefits are defined within the NPPF and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. However, in this instance, given the existing equipment is being upgraded to provide better coverage to the area the benefits of the works are unquestionable. The

proposed development accords with all these aspects of the NPPF, particularly as the proposal is for the replacement of an existing mast, and not therefore the addition of a new base station installation. Furthermore, the replacement equipment will ensure the operator(s) continue to provide good and improved network provision within the town and surrounding areas, bringing a range of associated economic and technical benefits.

Code of Best Practice on Mobile Network Development in England (March 2022)

The Code of Best Practice has been fully revised in March 2022 and is now even more supportive of mobile network provision in line with Government aspirations that everyone should have access to the information superhighway no matter where they are located whether that be in rural or urban areas. This Code provides guidance to mobile network operators, their agents and contractors and equally to all local planning authorities in England. It supersedes the Code of Best Practice on Mobile Phone Network Development (2016).

The principal aim of this Code is to support the government's objective of delivering high quality wireless infrastructure whilst balancing these needs with environmental considerations. It also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties.

The development of such infrastructure must be achieved in a timely and efficient manner, and in a way, which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code also highlights that wireless technology continues to evolve rapidly, and mobile devices are now capable of much more. Second generation (2G) technology gave us voice calls and text messages, 3G led to the launch of smartphones, and 4G, which enabled faster browsing, allowed us to do things like watching videos on the move. 5G, the latest generation of wireless technology, is much faster than previous generations of wireless technology and can offer greater capacity and lower latency, allowing thousands of devices in a small area to be connected at the same time. 5G networks, and future mobile generations, will be vital for a range of Internet of Things uses (IoT) and Smart City applications.

The Code highlights that local planning authorities should support the deployment of digital infrastructure by:

- Incentivising connectivity: support the expansion of telecommunications networks and take a 'joined-up' approach to the wireless infrastructure planning process, including ensuring that Local Plans effectively support the deployment of digital infrastructure.
- Facilitating sites: engage with operators when new sites have been proposed and discuss site requirements.
- Engagement with operators: respond positively to requests for engagement and make decisions in line with national policy and Local Plans. For planning applications, find solutions to issues and ensure timely decisions are made.
- Information and communication: ensure that members of the public can access information about any development proposals within their local area. Send communications promptly to an appropriate operator contact (or their representatives).

The Code highlights the Government's Communications Policy and Planning Policy. It acknowledges that digital connectivity is vital to enable people to stay connected and businesses to grow. Fast, reliable digital connectivity can deliver economic, social and well-being benefits for the whole of the UK. The Code indicates that recent changes in planning policy [and regulation] are intended to align with Government communications policy, where the ultimate goal is to achieve mobile coverage wherever it is needed. Furthermore, Section 2 of this Code also reiterates NPPF guidance in strongly supporting high quality communications infrastructure, which is seen as essential for sustainable economic growth.

The Code acknowledges that there are special operational and technical considerations associated with mobile network development, which have changed over time due to changes in technology and associated changes in demand. The Code acknowledges that all wireless network installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal. It then goes on to state that *"the three primary technical and operational considerations for installation sites are: ensuring that wireless infrastructure provides an appropriate level of coverage over the intended geographical area; ensuring that sites have sufficient capacity to meet user demand; and requiring a connection to the wider network 'backhaul'".*

It then goes on to state that *“With the introduction of 5G, more equipment will be required to provide coverage and capacity. 5G, as well as 4G, are data-driven technologies, and high volumes of data will be transmitted between base stations and wireless devices. 5G will require a denser network of base stations than previous generations, including more fixed line fibre optic cable for reliable and high capacity backhaul. The siting of 5G installations will be more constrained and guided by these special technical and operational considerations.*

Due to the scale and technological constraints of 5G equipment, in some cases previous camouflage design solutions, such as tree mast designs and concealing antennas in flagpoles, may not be practicable or suitable. In these cases, simple designs with particular attention to colouration and finishes may help reduce visual impacts on a site-specific basis”.

In acknowledging the considerations of new technology such as 5G, the revised Code continues to advise that this does not mean that there will not be a need for any new base stations. Indeed, for example, more base stations will be needed in areas where there has previously been only limited or no coverage and where coverage and capacity needs to be enhanced in line with Government commitments and customer demand. Similarly, some new sites will be required to replace existing sites that are lost, for example, through redevelopment of an existing building. Some masts may need to be redeveloped or replaced to enable an upgrade in services to take place.

Section 5 relates to mobile connectivity in the 21st Century, explaining that mobile phones and other devices are now everywhere. Mobile connectivity is not just making calls and texts but also mobile broadband. The majority of mobile phones in the UK are Internet enabled smartphones and large numbers of people also now own tablet devices. People are increasingly choosing to access the internet using a mobile device even when they have fixed broadband connection available.

The Code acknowledges that by the second decade of the 21st Century, the greatest increase in traffic across mobile networks was in data i.e., internet use (para 5.3). Paragraph 5.4 states that in terms of the wider economic impact of mobile connectivity, research by Deloitte on the economic impact of mobile broadband across a range of countries, showed that a doubling of mobile data use leads to an increase of 0.5% in the Gross Domestic Product per capita, while another study put the benefit of 4G mobile broadband to the UK economy at £75 billion over a decade. Section 5 of the Code goes on to highlight that connectivity promotes social inclusion. In recent years, more people

rely on a mobile phone than they rely on a landline. Furthermore, people on lower incomes are even more likely to live in a mobile only household, or to access the Internet using a mobile connection (para 5.5).

The Code highlights that planning authorities, and those who represent rural areas, should recognise the importance of access to reliable mobile broadband and services for those who live and work in rural communities, including coverage for the emergency services network. The benefits of high-quality wireless connectivity to the rural economy are far reaching - better wireless infrastructure will give rural communities greater choice and access to services, allow businesses to grow, and have positive impacts on healthcare, education, tourism, and remote working.

Additionally, as set out above, Para 18 of the Code of Best Practice for Wireless Network Development in England, which states that;

*Site sharing and use of existing infrastructure: make use of existing structures, **sites** [emphasis added] and masts possible to reduce the need for new development. The NPPF states that, when installing mobile infrastructure, the number of masts and **sites** [emphasis added] 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.*

Such matters in relation to siting are also addressed under para 25 of the Code, whereby it again highlights the weight given to utilising existing bases station sites as follows;

Sharing sites/masts: sharing sites should always be considered as this reduces the total number of sites/masts required for the network and also minimises the visual intrusion caused by wireless infrastructure. This may involve redeveloping an existing site, including installing a replacement mast that can accommodate additional radio equipment.

Planning Advice Note: PAN 62 Radio Telecommunications

PAN 62 refers to Radio Telecommunications and states that the NPPG (now superseded by the SPP and FPF3) considers the general siting and design principles for telecommunications. It states that

such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraphs 8 – 17 of Planning Advice Note 62: Radio Telecommunications broadly explain how mobile networks operate. Although the operators' networks are mature, improvements, upgrades and new sites are required for their networks for a number of reasons. For example, to increase capacity in an area of high demand, to provide new or improved network coverage in terms of quality as well as extent, or perhaps to provide coverage over a new development area such as a new housing estate or industrial park.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surrounding as; minimising the contrast between equipment and people's expectations of a particular scene and minimising the contrast between equipment and its immediate setting of background. For example, a lattice tower generally fits the expectations within industrial landscapes.

Paragraph 33 further identifies ways in which to minimise these contrasts as follows;

- select a shape and material appropriate to the character of the area;
- keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;
- develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;
- minimise the number of separate visual elements in a base station; and
- use regularity, order and symmetry in positioning equipment.

Furthermore, para 34 identifies a series of options that should be considered as a guide in selecting the siting and design of telecommunications equipment in order to minimise any resultant visual contrast. The implementation of telecommunications equipment is site-specific and therefore should be considered against the site conditions and coverage capacity requirements in addition to technical constraints and landscape character. The series of options is therefore a guide or checklist rather than a sequence to be rigidly followed. The options are:

- installing small scale equipment;
- concealing or disguising equipment;
- mast sharing;
- site sharing;
- installing on existing buildings or other structures; and
- erecting a new ground based mast.

As can be seen from the above, the proposal would result in the upgrading of equipment on the existing lattice tower mast at a well-established telecommunications site. Viewed within the context of this established use, where such telecommunications development would not therefore be seen as being visually incongruous, the mast would be very much viewed within the context of the existing and established site arrangement, ensuring that any impact is minimised as far as is practicable. The proposal would therefore be consistent with National policy guidance as set out above.

Local Planning Policies

Section 70 of the Town and Country Planning Act 1990, as amended, requires planning applications and appeals to be determined having regard to the provisions of the Development Plan and other material considerations, and section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications and appeals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

The Development Plan for the Gravesham area comprises;

- Gravesham Local Plan Core Strategy and Policies Map (Adopted 2014)
- Gravesham Local Plan First Review – Saved Policies (September 1994)

The Gravesham Local Plan Core Strategy was adopted in September 2014. It comprises a spatial strategy, strategic objectives, a spatial strategy, core policies and a monitoring and implementation framework with clear objectives for achieving delivery.

There are no specific policies relating to telecommunications proposal as former Policy U2 which related to telecommunications development was not saved and is not therefore a material consideration in the determination of planning applications.

The Vision for Gravesham states that *'By 2028, Gravesham will have reinvented and regenerated itself from an area with predominantly heavy riverside industry to one that offers a more diverse range of employment and housing which respects its unique built, historic and natural environment. The regeneration will have made the most efficient use of land by concentrating mixed use development on previously developed and greenfield urban sites with access to a good range of services and facilities which will have minimised the need to travel. In accordance with national and local planning purposes, the openness of the Green Belt will have been maintained and it will have been protected from inappropriate development. Land unnecessary to be kept permanently open will have been removed to provide additional land for development in appropriate locations'*.

Paragraph 5.4.4 states *'The provision of infrastructure is recognised as an important part of new development in the National Planning Policy Framework (NPPF). It requires local planning authorities to work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands. It states that Local Plans should identify priority areas for infrastructure provision and should plan positively for the infrastructure required'*.

In addition to the above, in the Core strategy (2014) both Policy SC07 'Economy, employment and skills' and Policy SC10 'Physical and Social Infrastructure' make reference to telecommunications technology. The local plan highlights that there are moderate prospects for growth through telecommunications improvements and that the council will support improvements to information and communications technology which will facilitate flexible working practices and the changing economic needs of the Borough (CS07). Furthermore, Policy CS10 states that the council will support proposals that protect, retain or enhance existing physical and social infrastructure. In this

regard, and while a similar proposal was previously approved at the site which has now expired, it is considered that the proposal would improve physical infrastructure, economic growth and social wellbeing (same consideration as accepted under application 20200819), and as there has been no material change in terms of the proposal or policy consideration, other than further increase in permitted development rights now meaning that the proposal would be permitted development subject to an application to determine whether the prior approval of the LPA is required in respect of matters relating to siting and appearance, should therefore be supported again.

3.3 Planning Assessment

The special operational and technical factors that require specific siting of lattice towers should be balanced by the need to minimise environmental and visual impact.

However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.

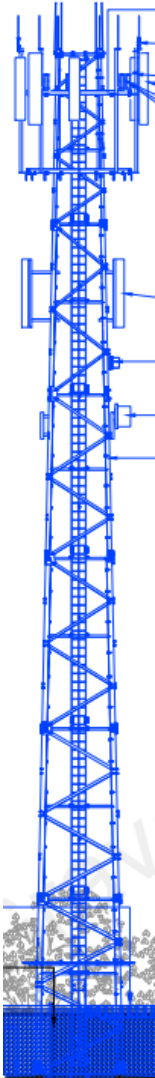
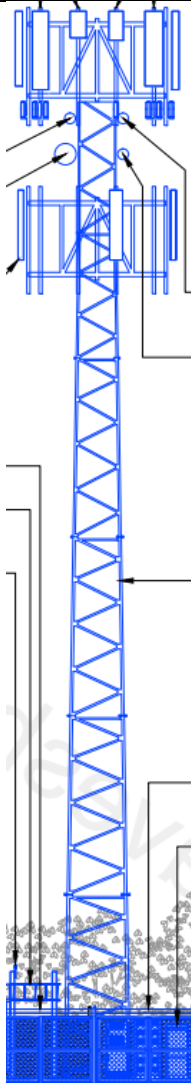
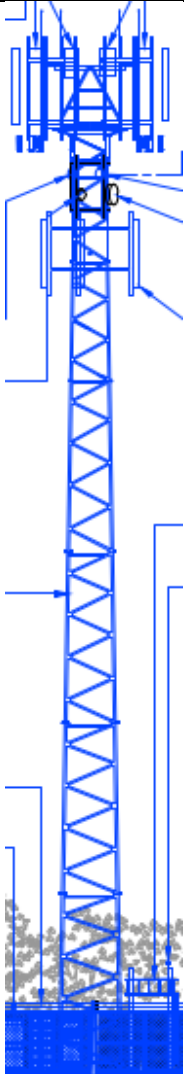
While it is considered that the proposal would be consistent with the aims of the NPPF in respect of supporting high quality communications, it remains the case that any such proposal should be well located and ensure there is no significant visual impact that would outweigh the social and economic benefits of the proposal. In this respect, the site has supported telecommunications equipment for circa 16 years and therefore the principle of such development at this location is considered acceptable. While an establish part of the landscape at this location, the introduction of a new taller structure will always be, to some degree, a noticeable change. However, it should be appreciated that the visibility of any such increase in height does not automatically result in an overwhelming adverse harm occurring, particularly when it involves the upgrading of an existing mast or redevelopment of an existing site, as is the case here. This position was previously accepted by the LPA in approving planning permission for a very similar proposal under application reference 20200819, which was approved on the 20th October 2020 and a subsequent S73 application also

approved for a minor variation in design under application reference 20211067 on the 27th October 2021, the permission of which expired on the 13 October 2023.

In addition to the above, as previous alluded to there has be no material change in policy to that against which the previous proposal was assessed against, nor any material change in the proposal in this instance which would be for the same size of replacement mast, albeit with a very minor change to the appearance to that previously approved. The only material change relates to the amendments to the GPDO since the original application was submitted, whereby permitted development rights were in fact increased under A.1 (1)(c) to allow any replacement mast, such as this, to be a height of 30m as opposed to the 25m at the time of the original submission. Consequently, while full planning was previously required it is now the case that the proposal benefits as permitted development (subject to an application made to the LPA to determine whether their prior approval is required) and as such the principle of the proposal is not in question, and only matter relating to siting and appearance for consideration under such applications.

Given the above, as the only matters for consideration in this instance are that of siting and appearance, as the site has a long established history of hosting telecommunications equipment and the LPA previously accepted a very similar proposal to that now being proposed, then in terms of siting it is considered that this location would be acceptable and no further or more detailed consideration would be required in this instance. The site will continue to host telecommunications equipment on it, as has been the case now for circa 20 years, and remains commensurate with the surrounding land uses.

In respect of appearance, the images below show the previous mast design/appearance that was approved by the LPA both as part of the full planning application as well as that of the subsequent S73 application to vary the details (condition No.2) of those previously approved under the full planning application, and also that of the proposed mast in this instance.

		
Approved design under application 20200819 for a replacement 30m mast	Approved design under application 20211067 (variation of condition 2 of application 20200819) for a replacement 30m mast	Proposed design for new Prior Approval application for a replacement 30m mast

As can be seen from the above, there is little in the way of noticeable change in the appearance of the proposed mast to those previously approved by the LPA, all of which are 30m in height. As such, it is considered that the proposal would once again represent a satisfactory form of development and, as the principle of the proposal is now not in question due to the fact it would now be permitted

development subject to this application to determine whether the Prior Approval of the LPA is required, and matter relating to the siting and appearance would not raise any concerns given the relevant planning history, the Prior Approval of the LPA should not be required in this instance given there is no material change in respect of the proposal for consideration or that of relevant policy consideration. This would be further echoed when considering the determination of the previous full planning application, whereby the officers delegated report concluded the following.

'The Local Planning Authority consider that the design and height of the replacement tower and supporting apparatus to be the best compromise between the visual impact on the surrounding area and meeting the technological requirements to deliver 5G connectivity. The proposal has the capacity to improve Gravesham's physical infrastructure, economic growth and social wellbeing. Therefore the application accords with Policies CS07, CS10 and CS19 of Gravesham's Local Plan Core Strategy (LPCS)(2014) as well as Sections 10 and 12 of the National Planning Policy Framework (NPPF) (2019).'

[NOTE – the relevant version of the updated NPPF is now 2024]

This was again confirmed in the conclusion section of the officer's report, whereby it concluded the following.

'The application is considered to be in accordance with Section 10 of the National Planning Policy Framework (2019) and the government objectives to support the next generation of mobile technology infrastructure. The 5G information and communication technology has the capability to improve physical infrastructure, economic growth and social wellbeing in accordance with Policies CS07 and SC10 (LPCS).

This proposal will extend the existing site in order to accommodate a larger tower and supporting apparatus is not considered to adversely impact on the character or appearance of the area. Although it is bulkier and larger it is not dissimilar to other lattice structures and is not considered to have a detrimental impact on views in the area. Therefore it is considered to be in accordance with Policy CS19 (LPCS) and Section 12 (NPPF) in terms of design. Furthermore the application site will not impact on the amenity of any neighbouring properties'

As stated previously, the proposal would look to utilise and upgrade an existing telecommunications site, thereby ensuring that the number of sites is kept to a minimum consistent with the needs of the operators and sequential approach at both national and local levels. The proposal is a well-considered design (as previously accepted by the LPA), which conforms specifically to the NPPF in the determination of this application. While the Council has no policies which would meet the requirements of the NPPF in this regard, the proposal conforms with the NPPF which fully supports high quality communications infrastructure. Additionally, the proposal fully conforms with The Code of Best Practice, as well as more generic Local Plan policies as demonstrated above.

Economic and Social Benefits

The NPPF strongly supports sustainable development as does the Council's Development Plan. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without the need to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. This fully complies with the aims of the NPPF and the Council's Core Strategy to minimise the effects on climate change by reducing the need to travel and as a consequence the carbon footprint.

It is therefore clear that the Government places significant importance on reliable communications and as such the Planning Inspectorate gives significant weight to the public benefit arising from local service provision. The issue of benefits and planning balance is considered in Appeal Ref: APP/L1765/W/18/3197522 (Land at the junction of Andover Road and Athelsan Road, Winchester for the erection of a 17.5m street works pole).

The Inspector found at Paragraph 9 *'The Government places a high priority on the provision of high quality communications. The National Planning Policy Framework (the Framework) at Paragraph*

112 states, “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”. In this instance, the proposal is not so much seeking to provide significantly higher standards but to maintain recent local provision of 2G, 3G and 4G services as a result of a notice to quit from a nearby site that was providing these services. The Council has commented that service provision would be ‘adequate’ without the proposal, but the appellant has an obligation to provide not only appropriate coverage but also capacity for the network. I attach significant weight to the public benefit arising from the continuation of local service provision’.

In addition to the above, this issue of public benefit and planning balance was also considered in Appeal Ref: APP/X5990/W/3162918 (55-59 Oxford Street). In this case, the Inspector found at Paragraph 20 *‘Whilst I have paid special attention to the desirability of preserving or enhancing the character or appearance of the conservation area, the above factors lead me to conclude that there is less than substantial harm to the character and appearance of the existing building and the SCA. Therefore, whilst there is some conflict with WCP and UDP policies, the less than substantial harm that I have identified is outweighed by the clear public benefits of the proposal in maintaining and improving vital communications infrastructure at an important location’.*

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is also essential to fulfilling the potential of new technologies. Innovation such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Paragraph 39 of the NPPF (2024) states that:

‘Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments

that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible’.

Maintaining high quality 2G, 3G and 4G coverage and capacity within the area fully meets this aim of the NPPF. The social and economic benefits are significant material considerations which should be weighed against any visual impact associated with any mast at this location, whether a new mast or the alteration/replacement of an existing mast as is the case in this instance. In addition to the above, HM Treasury outline such benefits in its report *‘Fixing the Foundations: Creating a more Prosperous Nation’* (July 2015). Paragraph 7.1 states that reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home.

Paragraph 7.2 goes onto highlight strong support for high quality communications infrastructure. It states:

‘By reducing regulatory red tape and barriers to investment, the government will support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK’s businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage’.

Indeed, MPs have noted in parliament that the UK’s Superfast Broadband connectivity was ‘relatively poor’. As such, there has been continuing and growing strong national support for a high quality communications infrastructure that is fit for purpose and helps promote the UK as a world leader in this regard, particularly with the roll-out of 5G coverage. Further to Governments commitment to improve connectivity, on 24th November 2016 the new ‘permitted development’ rights for telecommunications operators came into force, designed to lift the restrictions on mobile operators such is the significance of the significant weight that Government places upon the benefits attached to modern connectivity.

In October 2016, there was also the BIG Infrastructure Group (as chaired by MP Grant Shapps) Report release calling on operators to improve their network. This is signed and has comments from numerous MP's nationally. A National Needs assessment – A Vision for UK Infrastructure was also published in October 2016. It sets out the infrastructure needs for the UK which includes the importance of digital technology. An extract of this assessment can be found below:

'A lack of sufficient digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global marketplace. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases'.

The Assessment goes on to note that *'Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy'*. This Assessment goes on to further explain the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of maintaining high quality 2G, 3G and 4G coverage to this busy area a short distance to the east of the capital, where the social and economic benefits significantly outweigh the environmental considerations.

Ministers from the DCMS and MHCLG wrote to all CEOs of the Council's in England (March 2019) setting out the position in respect of supporting investment in high-quality, reliable digital connectivity. The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion. Ministers state:

'it is essential to keep pace with growing demand for internet bandwidth and mobile data from local businesses, residents and those who visit our communities. As outlines in the Future Telecoms Infrastructure Review, the Government would also like to see national full fibre coverage by 2033. We would also like the UK to be a work leader in 5G, with the majority of the population covered by a 5G signal by 2017. We are writing to ask for your help in supporting the investment necessary to achieve these objectives.

Recent years have seen substantial investment in mobile and fixed digital infrastructure across the UK. While mobile coverage across the UK has been significantly improving, there are still too many areas where coverage is poor. The UK has now achieved 95% superfast broadband coverage but still only 6% full fibre coverage.

We need to create the market and policy conditions to support the large-scale commercial investment required to extend and future-proof digital connectivity. A key part of this is making it easier for operators to deploy infrastructure. To help to achieve this, the Government recently reformed the Electronic Communications Code – the statutory framework which underpins agreements between communications network providers and those in both the private and public sectors who can provide sites for the installation of network equipment. The purpose of the reform was to make it easier and more cost effective for communications network providers to deploy and maintain digital infrastructure.

Local Authorities have an essential role to play as site providers. As Chief Executives, you can support investment in digital communications infrastructure by ensuring your organisations have policies and procedures in place that promote effective engagement with the digital communications industry and minimise barriers to deployment'

The taller replacement mast will continue operators to provide high quality 2G, 3G and 4G coverage and capacity, as well as 5G when applicable, supporting the Government's aim to 'focus on ensuring everyone is connected to the information highway'. This fully meets the aspirations of the NPPF and the Council's strategic strategy in general terms.

Lack of 5G Coverage – Material Consideration

Mobiles can only work with a network of base stations in place where people want to use their mobile phones or other wireless devices. Without base stations, the mobile phones and other devices we rely on simply won't work.

Without this upgraded radio base station 5G will not be rolled out in the area. If the 5G network is not available then the customers' would not be able to utilise these handheld devices for the

purposes in which they were purchased. This is contrary to national and local level policy which seeks to support the expansion of electronic communications networks including next generation mobile technology such as 5G.

Overall, it is clear that the proposal would be consistent with the sequential approach for upgrading telecommunications infrastructure and support the overarching principles of supporting high quality communication networks set out within the Framework and meet the requirements of the sustainable development objective and infrastructure requirements of the NPPF which wholly supports the growth and improvement of operator networks via the use of existing telecommunications sites and site sharing between multiple operators over a new site when possible.

4.0 Access

The site is located within an existing and secure compound, which allows no access to the general public or unauthorised persons given the hazards associated with the Water Treatment Works site. Access to the site is by way of a locked gate with the telecoms infrastructure further enclosed within its own compound enclosed by way of a 1.8m high chainlink fencing. The existing access to the site will ensure ease of access for both construction and maintenance.

Once installed, the development will be unmanned requiring only periodic visits for routine maintenance and servicing.

In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications sites are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive.

The Government guidelines state that provided a proposed telecommunications site meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

The application is accompanied by a valid ICNIRP certificate. The certificate provides assurance that the equipment complies with both national and international emissions standards and that the proposed design and location allows the equipment to be well within the parameters set by the ICNIRP standard.

6.0 Conclusion

The requirement for new equipment in this area is to provide improved mobile phone coverage for local residents, visitors, and businesses due to capacity issues associated with the existing infrastructure. The existing telecommunications site would continue to provide the latest communication services for surrounding businesses and local residents and would therefore deliver the Government's objective of the public having access to a choice of high-quality electronic communications services.

The proposed telecommunications equipment installation as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The proposed equipment will update and improve the coverage the area receives and will ensure operational efficiency. Furthermore, as highlighted above in this report the proposal would be very similar to that previously assessed and approved by the LPA under applications 20200819 (full planning) and 20211067 (S73 for variation of Condition No.2 of the approved full planning permission), neither of which were implemented and so the permission(s) elapsed. Furthermore, changes to the relevant part 16 of the GPDO now means that the proposal would be permitted development as opposed to requiring full planning permission, which further highlights the Government's agenda to facilitate the growth of existing and new telecommunications systems and assist operators obligations to meet customer demands for improved quality of service.

The social and economic benefits of providing reliable and high quality mobile broadband connections including 5G support growth in productivity, efficiency and labour force participation across the whole economy. These additional benefits provide further material considerations that would weigh in favour of the proposal.

As a result, Gravesham Borough Council are requested to give all of the above matter's due consideration and timeously determine that, as there is no material change to the previous assessment, consideration or policy implication, determine that their prior approval is not required in this instance.

The proposal is fully compliant with ICNIRP guidelines.