

SUPPLEMENTARY INFORMATION
1. Site Details

Site Name:	Vale Road	Site Address:	Vale Road, Gravesham, Kent, DA11 9RE.
National Grid Reference:	562865 E 173525 N		
Site Ref:	30702/GVM091	Site Type: ¹	Macro

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

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why: No suitable alternatives were identified.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: No suitable alternatives were identified.		

Annual Area Wide Information to local planning authority

Date of information submission to local planning authority	Information not available
Name of Contact:	
Summary of any issues raised:	

Pre-application consultation with local planning authority

Date of written offer of pre-application consultation:	18/06/2024
Was there pre-application contact:	No
Date of pre-application contact:	
Name of contact:	
Summary of outcome/Main issues raised: No response from the LPA has been received to date.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red
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The site was rated amber due to its potential visual impact and proximity to existing residential properties. It was reassessed following local resident objections 21-06-2024.

The following councillors were consulted following the initial assessment on 18-06-2024:

Councillor John Burden

Councillor Lauren Sullivan

Contact was received from Cllr Shane Mochrie-Cox, copied to Cllr Shazad Ghani, on 30-07-2024 stating this site lies in his ward, not the ward belonging to the councillors contacted. Site appears to lie very close to ward boundary, which has led to this confusion. Cllr Mochrie-Cox noted that he objects strenuously to the proposal and does not want us to go ahead with the application due to the fact that he deems the proposed equipment too large for the location, potential disruption during construction and maintenance and the fact that the applicant is not the owner of the land in question (site is located on Highways land). He also stated his intention to call the application in to Planning Committee if it goes ahead.

A mailshot to the residents of nos 37-57 Vale Road (odd nos only) was sent out on 18-06-2024. Responses from 3 addresses have been received to date objecting on the following grounds - placement of the site on a grass verge opposite residential properties, health and safety, potential for vandalism and crime, traffic and construction disruption, visual impact and environmental impact. Responses were sent out to all three objectors, who have all indicated they intend to lodge formal objections with the Local Planning Authority.

No consultation letter was sent to the local MP, as due to the General Election there was no local MP of record during the consultation period.

School/College

Location of site in relation to school/college *(include name of school/college)*:

The nearest schools are St Botolph's C of E Primary School, approximately 210m north east, St Joseph's Catholic Primary School, approximately 315m north west and Our Lady's Pre-School Northfleet, approximately 210m north west.

Outline of consultation carried out with school/college *(include evidence of consultation)*:

Consultation letters were sent to all schools named above on 18-06-2024.

Summary of outcome/Main issues raised:

No responses from any of the consulted establishments have been received to date.

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
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	29-07-2024	

3.0 Proposed Development

The Proposed Site:

The proposed site is located to the west of Gravesend, in Northfleet ward, on Vale Road, which runs along the western edge of the Northfleet Urban Country Park. This section of Vale Road is sited approximately 165m north west of the A226 and approximately 520m south of B2175.

In addition to being located directly adjacent to the Northfleet Urban Country Park, the proposed site is located approximately 490m north east of Rosherville Recreation Area. Considering the distance and intervening buildings, roads and houses, the development will not be visible from Rosherville Recreation Area, however, it is acknowledged that the headframe and upper portion of the monopole will be visible from the Northfleet Urban Country Park above the tree canopy.

The proposed development is not sited within any land designations, but two listed buildings lie within 600m of the proposed site. The Old Rectory House, Grade II*, is sited 530m to the south west, with 78-80 Vale Road, Grade II, 535m, also to the south west. It is not considered that either of these historic assets will be adversely impacted by the proposal.

The nearest residential properties are on the opposite side of Vale Road from the proposed development. These properties will be afforded unobstructed views of the installation, although it will be seen with a backdrop of trees and amongst the other elements of vertical street furniture in the area.

The proposed new mast has been sited and designed in order to provide 5G coverage and to support the existing mobile network. At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides such additional capacity to the network whilst still promoting the improved 5G technology.

The proposed development is within the limits set out in Part 16 for permitted development with Prior Approval. The location enables the whole of the surrounding area to benefit from improved cover and capacity of the existing network as well as the introduction of 5G network coverage and has been designed to be future proof, thus enabling other technologies to be deployed depending upon the demand required. As the shift in demand is expected for the foreseeable future and that as central government considers digital communications to be a critical national infrastructure, we intend to support customers and local residents by ensuring as little disruption as possible. The existing site will therefore be retained so that all existing users may benefit at this difficult time. In addition, EE will become the Emergency Services Network Provider and in order to dedicate the 4G network for that use, the intention is to support all users during the current climate and to maintain all current services without the removal of any existing equipment.

The applicant would also like to stress that telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This new cell will allow telecommunications infrastructure providers (EE/H3G) to ensure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services specifically at this critical time.

The height of the proposed apparatus is the minimum capable of providing the technological improvements sought.

A certificate has been included with the application confirming compliance with ICNIRP guidelines.

The proposed location and design are considered to provide the optimum solution in this instance, the new site will enhance the coverage of the existing 2G/3G/4G network and also implement 5G technologies providing enhanced coverage to the public and emergency services alike.

The site has to fit into an existing network, this location will allow advancements in capacity and will give the opportunity for further people to work from home as well as support emergency services in receiving real time data, inevitably enhancing 2G/3G/4G communications which is imperative.

For the avoidance of doubt, the applicant would like to stress that although there is an existing site in the vicinity (at B&S Motors Industrial Park) this site is to be decommissioned as the land is marked for housing and public open space redevelopment and as such it is no longer capable of maintaining the required network capacity and coverage needs. The proposed site is to be used to support the current network in implementing 5G connectivity as well as maintaining and increasing connectivity and capacity to much needed areas and therefore this application should be reviewed as a new site application. Site notices notifying the public of the proposal have been put in place during the survey stage of site identification.

A previous application (20230807) for the installation of a site on the roof of Carl Ekman House, approximately 250m to the north west, has recently been withdrawn as the rooftop has been discovered to be structurally unsuitable for the required equipment.

Aerial view of the site



View looking north west along Vale Road to the railway bridge, site location is on the left.



View looking south east along Vale Road from the railway bridge, site location is on the right.



View of the site location, looking from outside the houses on Vale Road.



Planning History

20231191

Resubmitted application as to whether prior approval is required for proposed telecommunications installation of a 20m monopole, 12 no. antenna apertures, 2 no. 600mm transmission dishes, 6 no. equipment cabinets and development ancillary thereto.

Refused 17-01-2024

20230936

Application as to whether prior approval is required for proposed telecommunications installation of a 20m monopole, 12 no. antenna apertures, 2 no. 600mm transmission dishes, 6 no. equipment cabinets and development ancillary thereto.

Refused 24-10-2023

Current Telecommunications Use/ The Future

Since the introduction of the mobile networks, mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. Mobile is the next generation of technology to enable increased connectivity with increased data speeds.

The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that *“Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...”*, as will be considered in more detail below. The current proposal will provide positive benefits to the transport network here which will far outweigh any perceived negative visual impacts.

MBNL has produced an advisory note entitled MBNL 5G and Future Technology and this is enclosed as part of the application.

Type of Structure (e.g. tower, mast, etc.): Monopole

Installation of an 18m monopole, 9 no. antenna apertures, 2 no. 300mm transmission dishes, 6 no. equipment cabinets and development ancillary thereto.

Overall Height: 18m

Height of existing building (where applicable): N/A

Equipment Housing:

Length: As per attached drawings

Width: As per attached drawings

Height: As per attached drawings

Materials (as applicable):

Tower/mast etc – type of material and external colour: **As per attached drawings**

Equipment housing – type of material and external colour: **As per attached drawings**

Reasons for choice of design:

Central government attaches great importance to the design of the built environment and outlines this within section 12 (Paragraph 124) National Planning Policy Framework (Revised). It states:

‘Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’.

In keeping with the National Planning Policy Framework (NPPF) guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the surrounding environment.

It is accepted that the proposed site will constitute a significant increase to the number of structures in the street scene, however the choice of design has been heavily influenced by technical constraints and the siting and appearance of the site location itself; along with added emphasis to cater for future coverage and capacity requirements. The monopole is slimline and all equipment cabinets will be installed in a single line with the monopole, which will help reduce the obtrusiveness of the installation.

Notably, there are 3 main elements to a radio base station; the cabin or cabinets contain the equipment used to generate the radio signal(s), the supporting structure that holds the antenna in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with the necessary amplifier or receiver units). Other elements necessary for the base station to function are a power source, feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general as *‘development ancillary’* to the base station.

In order for the base station to effectively provide coverage to the desired areas and fit in with the established network pattern, specific antenna orientations and heights, determined by network radio planners, must be achieved. Features of the surrounding area such as existing buildings and trees referred

to as 'clutter' must be cleared so the antenna can 'see over' any obstructions in order that they do not block the signals from the antennas. There are also limitations on how far from the antennas the equipment housing can be placed, as the quality of signal deteriorates as the length of feeder cables linking them increases.

The cell site has been specifically designed for the site in question, considering the existing street scene along Vale Road. The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements needed by the operator. Following a refused design including a 20m monopole, the proposal has been redesigned to include a lower monopole, fewer antenna apertures and smaller transmission dishes, to reduce the impact of the installation on the street scene. The redesigned installation also proposes to colour both the monopole and equipment cabinets green, which will help them blend with the backdrop of trees and vegetation.

Network Planners have indicated that the position of the additional cell is the ideal location to provide optimum coverage to both enhance the capacity of the current network and also bring advanced technologies to the area. It should be noted that the new technologies and increase to the existing network will provide high-quality and high-speed critical communication infrastructure, this is essential for economic growth and to improve a critical service as illustrated in the NPPF and Government COVID-19 aim.

The requirement for the additional site is to support the existing network and has been designed in order to provide network coverage and capacity where demand is located. During normal times network capacity is within city centres and places of work. As the country faces this crisis, demand has shifted to different locations and there is far greater demand and thus requirement for increased capacity. It is highly likely the population will work in this manner well beyond when any restrictions are lifted.

4.0 Technical Information

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

interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.			
Frequency	To be provided on request		
Modulation characteristics ²	To be provided on request		
Power output (expressed in EIRP in dBW per carrier) In order to minimise interference within its own network and with other radio networks, EE operates its network in such a way that radio frequency power outputs are kept to the lowest levels commensurate with effective service provision. As part of EE's network, the radio base station that is the subject of this application will be configured to operate in this way.	To be provided on request		
Height of antenna (m above ground level)	18m		

5.0 Technical Justification

Background:

As part of EE Ltd's and H3G (UK) Ltd's continued network improvement program they wish to enhance the existing site to facilitate additional coverage and capacity requirements, incorporating new technologies. Section 10 of the NPPF sets out the Government's general overview regarding supporting high quality communications infrastructure, recognising that advanced, high quality communications infrastructure is essential for sustainable economic growth.

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

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

² The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase Modulation.

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation.

It is imperative that support is given to the introduction of new infrastructure to allow new technology which will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds. This will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in telecommunications technologies and development. Whilst it is acknowledged that there is a significant increase in the scale of telecommunications development on the site, it should be noted that the new technologies will provide advanced high-quality communications infrastructure essential for economic growth as sought by the NPPF.

All EE and H3G installations are designed to be fully compliant with the public exposure guidelines established by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). These guidelines have the support of UK Government, the European Union and they also have the formal backing of the World Health Organisation. A certificate of ICNIRP compliance will be included within the planning submission.

Discount Option	NGRs	Reasons
Dudley Road SW	563155E 173627N	This option was discounted due to a lack of room to accommodate the required equipment without impeding pedestrian access.
St Botolph's C of E Primary School GF	562934E 173713N	This option was discounted due to the sensitive nature of the area, as well as the fact that schools should be avoided when considering locations for telecommunications installations.
Our Lady's Pre-School GF	562658E 173685N	This option was discounted due to the sensitive nature of the area, as well as the fact that schools should be avoided when considering locations for telecommunications installations.
Springhead Road SW	562368E 173341N	This option was discounted due to being outside of the required area for the installation. It would result in a loss to the existing coverage and capacity that this installation seeks to preserve, as the location is too far from the existing site.
Lidl Distribution Centre RT	562887E 174162N	This option was discounted as the rooftop is not suitable or capable of supporting the required equipment.
Rosherville Way SW	563209E 174171N	This option was discounted due to a lack of available pavement space for the equipment without impeding pedestrian access. The land to the east is also under development as a housing estate and it would be inappropriate to build a mast without the ability to accurately ascertain the impact on new properties. In addition, it is outside of the required cell area for the installation.
Crete Hall Road SW	563432E 174286N	This option was discounted due to a lack of available pavement space for the equipment without impeding pedestrian access. In addition, it is outside of the required cell area for the installation.
Thames Way Roundabout SW	562473E 173648N	This option was discarded as it is outside of the required cell area for the installation, resulting in a loss of coverage and capacity from the existing site. In addition, there are a considerable number of trees surrounding this roundabout which would impede the construction of the tower. Lopping in this location would be considered inappropriate.
Rosherville C of E Primary School GF	563017E 173961N	This option was discounted due to the sensitive nature of the area, as well as the fact that schools should be avoided when considering locations for telecommunications installations. The site location is also outside of the required cell area for the installation.

London Road SW	563017E 173961N	This option was discounted as it is outside of the cell area required for a replacement installation.
Carl Ekman House RT	562653E 173719N	An option on the rooftop of this building has been explored. Initial planning permission granted in 2021, cannot now be utilised due to other works having been carried out on the rooftop. A further application for an installation on a different area of the building was submitted in July 2023, but has now been withdrawn as further investigations of the rooftop have determined that the available space is not structurally capable of supporting the required equipment.
Industrial Park	562763E 173634N	The existing site has been discounted as it is being decommissioned due to the land being redeveloped and therefore unable to accommodate the equipment required for an upgrade.



Additional relevant information

Planning Policy Assessment

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

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) was published in July 2021 and supersedes previous versions of the document and national planning guidance contained in the various Planning Policy Guidance notes and planning Policy Statements. The NPPF sets out the Government's economic, environmental and social planning policies and how these are to be applied in relation to all planning applications.

Under Section 6 paragraph 81 the NPPF advises...." *Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.*" In terms of supporting a prosperous rural economy paragraph 85..." *The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.*" This approach provides a sustainable solution to the need to enhance telecommunications services in the area which will benefit not only the local community, but also visitors to the area and potentially reducing the need to travel.

In section 10 of the new NPPF, the document seeks to support "Advanced, high quality and reliable communications infrastructure" ensuring that it is "essential to economic growth and social wellbeing". It advises that "planning policies and decisions should support the expansion of electronic communications networks including next generation mobile technology (such as 5G) and full fibre broadband connections." Paragraph 115 states "the number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate." The proposal allows for the re-use of an existing telecommunications site which will be enhanced to allow for the introduction of 5G technologies in a location as close as possible to the existing site.

Paragraph 116 continues "Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

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

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

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



Paragraph 114 emphasises that *“high quality and reliable communications infrastructure is essential for economic growth and social well-being”* and that *“planning policies and decisions should support the expansion of electronic communications networks.”*

Paragraph 115 advises that the re-use of existing masts and buildings should be encouraged and equipment should be well designed/camouflaged where possible.

The proposal has been designed with the aim of achieving a balance between minimising visual impact and achieving the technical requirements for EE (UK) Ltd and H3G (UK) Ltd to enhance telecommunications services in the area to the benefit of the local community and visitors to the area. It will make effective use of the land as set out under Section 11 of the NPPF.

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

Improving the communications infrastructure is critical to supporting sustainable economic growth. Para 81 of the NPPF notes that significant weight should be placed on the need to support economic growth and productivity. Para 83 states that planning decisions *“should address and recognise the locational requirements of different sectors”* which will include the needs of the locational requirements of digital communications infrastructure.

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

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

Local Planning Policy

The statutory development plan for the area is comprised of the Gravesham Local Plan Core Strategy Adopted September 2014.

Gravesham Local Plan Core Strategy Adopted September 2014.

Policy CS01: Sustainable Development

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

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

4.1.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of

making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- Specific policies in the Framework indicate that development should be restricted.*

The introduction of up to date 5G technologies will significantly improve connectivity in the area and will enable it to remain competitive. Mobile operator networks have been under increased pressure to provide up-to-date telecommunications functionality, as mobile phones and mobile broadband use have become increasingly essential to our daily lives. 5G is the next generation of technology to enable increased connectivity with increased data speeds. The growth of digital connectivity over the last decade and the expectations of users have advanced at an unprecedented level. The NPPF recognises that “Advanced high quality and reliable telecommunications infrastructure is essential to economic growth...”, as highlighted above.

The COVID-19 crisis necessitated mass homeworking, which showed the importance of fast, reliable broadband and how mobile telecommunications has become even more vital within society. Introducing 5G to the area will ensure that residents have the flexibility to quickly and easily pivot to any working from home situation. Given that it is also anticipated that many people have continued and will continue to work flexibly from home in the changed working climate, the increased and enhanced provision will meet this requirement to respond to changes in lifestyle and provide a high quality of life for residents.

Policy CS10: Physical and Social Infrastructure

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

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

The proposed installation is to replace and improve upon an existing site that is to be decommissioned due to land redevelopment. The proposed development will ensure that there is no loss of capacity or connectivity, and will bring new technologies to the area. The 5G network is the fastest and most reliable service mobile operators are able to offer. It will provide positive benefits to the community, serving a range of individuals and facilities.

Policy CS12: Green Infrastructure

5.7.22 A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Green Infrastructure Network.

5.7.23 Sites designed for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and RAMSAR sites,



followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

5.7.24 There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

5.7.25 Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

5.7.26 The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.

While it is proposed to install this site on a grass verge, adjacent to Northfleet Urban Country Park, it is not anticipated that this installation will require the lopping of any trees or any significant destruction of vegetation in the area. Other, more sensitive sites have been avoided, so that loss of green infrastructure amenity and biodiversity are kept to a minimum.

Policy CS13: Green Space, Sport and Recreation

5.8.7 The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base.

5.8.8 A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on-site. However, where this is not possible because of the site size, location or other specified circumstances, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space.

The site is not located within the Green Belt, nor any areas of Public Open Space. The Northfleet Urban Country Park is located to the west of the proposed site, on the other side of the treeline. While it is acknowledged that the monopole and attached headframe will stretch above the tops of the trees, this line of trees will mitigate any potential views of the lower level equipment that accompanies the installation and preserve much of the existing visual amenity. Placement of the installation within the country park itself has been avoided, in favour of a streetworks installation on a nearby street, as this was considered to be less detrimental to the green space amenity of the Northfleet Urban Country Park.

Policy CS19: Development and Design Principles

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



- *Using the collaborative approach advocated in Building of Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;*
- *New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;*
- *New development will be located, designed and constructed to:*
 - *Safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;*
 - *Avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and*
 - *Not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;*
- *The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;*
- *New development will be designed in an inclusive way to be accessible to all members of the community;*
- *New development will provide appropriate levels of private and public amenity space;*
- *New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;*
- *Car parking will be well related to the development it serves;*
- *New development will protect, and where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;*
- *New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;*
- *The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;*
- *New development will incorporate appropriate facilities for the storage and recycling of waste; and*
- *The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.*

The proposed installation will bring 5G to the area, supporting modern infrastructure and providing the best network connectivity possible across Gravesend. The 5G network is to be the fastest service operators are able to provide, the new technology will enable easy and rapid access to information. The installation is located within a primarily residential area, with several schools and pre-schools alongside other community facilities in the vicinity. The increased demands of these users puts an increased strain on the telecommunications network, which is likely to be compounded by the continued increase in flexible homeworking over recent years.



The introduction of 5G technologies will enable places to remain competitive and will support the Government's ambition for the UK to become a world leader in 5G. It is imperative that support is given to the introduction of 5G technology as this will allow networks to be able to handle more data and connect more devices simultaneously at much faster speeds than is possible using the existing technology.

The proposed development has been specifically designed for the site in question, taking into account the site context and the character and appearance of the surrounding area. The amenity of nearby occupiers has been fully considered, alternative proposals and sites were previously considered, but none were found to provide a more acceptable solution; - telecommunications development is location dependent and more sensitive locations have been avoided.

While it is acknowledged that the proposed installation will incorporate a significant new structure in the streetscene, the site will be seen in context, with the trees of the Northfleet Urban Country Park behind it and other vertical elements of the streetscene in the vicinity.

The proposal features a redesigned installation, with a lower monopole height, fewer antenna apertures and smaller transmission dishes. It is also proposed to colour the monopole and equipment cabinets green. These amendments have been made in response to the LPA's stated reason for refusal relating to the previous application at this location (20231191).

The applicant acknowledges that the proposed development will be prominent and will have an impact on the character and visual amenity of the area, however, it is hoped that the smaller size of the installation and amended colour of the equipment will provide some mitigation. Locations to place a replacement site within the required search area are limited, particularly when certain areas must be avoided, such as open spaces like the Northfleet Urban Country Park and local school premises. The areas immediately surrounding the railway must also be avoided, in order to ensure there is no adverse impact on the operation of the rail network. It was considered that this particular location was the least impactful of the available viable options (see discounted options section above for options investigated but discounted).

CONCLUSION

There is a requirement for EE (UK) Ltd and H3G (UK) Ltd to provide advanced telecommunications technologies to this suburban area in Gravesend. Network planners have identified a need for an enhanced installation and the proposed development will address this identified need and continued customer demands.

The social and economic benefits of providing reliable and high quality mobile 5G connection support growth in productivity, efficiency and labour force. It is contended that the positive benefits to the modernisation of this mobile network service will outweigh any minor loss of visual amenity to the surrounding area.

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

Furthermore, the applicant would also like to stress in today's current crisis (COVID-19) it is imperative that communications are not only maintained but also enhanced to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT and data infrastructure, 999 and 111 critical services. This new cell will allow telecommunications infrastructure providers (H3G) to ensure quality, capacity and operational performance so that customers have uninterrupted access to crucial mobile and broadband services



specifically at this critical time.

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

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