

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Batts Road	Site Address:	Batts Road Cobham Gravesend Kent DA13 0XE
NGR:	E: 567033, N: 167477		
Site Ref Number:	ESN40094	Site Type: Macro	30H Tower (ESN)

2. Pre-Application Check List

Site Selection

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

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	Numerous
Was there pre-application contact:	Yes
Date of pre-application contact:	Numerous
Name of contact:	Ethan Bonthron & Amanda Grout
Summary of outcome/Main issues raised: This site has considerable planning history. Please note the below and the second submission can now also not be progressed. This planning application (reference: 20210769 will be withdrawn imminently) PLEASE NOTE THAT THIS PROPOSAL FOLLOWS THE REFUSAL OF APPLICATION REFERENCE: 20201121 WHICH WAS REFUSED ON THE 23RD of MARCH 2021. THE SITE HAS MOVED TO A LOCATION WHICH IS NOT AS EXPOSED AND BENEFITS FROM MATURE TREE COVER TO ADDRESS THE PREVIOUS REASONS FOR REFUSAL.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:		Amber	
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Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.

Further consultation has been undertaken with the Consultees below:

Councillors of Shorne, Cobham and Luddesdown Ward (Councillors Tony Rice and Bob Lane) and Cobham Parish Council.

Summary of outcome/Main issues raised: No responses had been received at the time of submission.

School/College

Location of site in relation to school/college: There are no schools in close proximity to the site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

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:	11 th August 2021	

3. Proposed Development

The proposed site:
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1. *The proposed telecommunications station by virtue of introducing a large alien structure onto a prevalent position on the apex of Cobhambury Hill with open vistas onto the Kent Downs Area of Outstanding Natural Beauty (AONB) will cause detrimental harm to the quality of the landscape and would fail to either conserve or enhance the natural beauty of the Kent Downs. Therefore, the development fails to comply with Kent Downs AONB management plan policies SD1, SD8 and AEU14, is contrary to Sections 13 and 15 of the National Planning Policy Framework (2019) as well as Policy CS12 of Gravesham's Local Plan Core Strategy (2014).*

The Home Office-led emergency services mobile communications programme provides a basis to develop a new 'blue-light' communications service known as the Emergency Services Network (ESN). EE (UK) Limited have been selected by the Home Office to provide the resilient national mobile network and appointed a number of agents including WHP Telecoms (WHP) to support site identification, acquisition and planning approval services to extend critical site coverage across some of the hard-to-reach areas of the UK. This project is to improve the connectivity of the sites and to give robustness to their ability to transmit signal for the vital ESN network. The proposed installation is an EE (UK) Limited installation. The Emergency Services utilise the EE (UK) Limited network. In keeping with the National Planning Policy Framework (NPPF July 2018) guidelines of using high quality communications infrastructure the proposed design has been selected to minimise visual impact upon the sensitive locations that the mast is situated in. The applicant fully appreciates the sensitivities of these sites, but all locations urgently need improved coverage and thus the site specifics are set if the targeted roads and areas are to be covered for the Emergency Services. Trees situated at the roadside (in that locale) and in the area and adjacent to the installation will prevent full views to the installation. The elevation of the land upon which the installation is situated upon will also prevent views of the installation, preventing it from being in the direct eye line of motorists. The installation is situated adjacent to an existing footpath, the edges of the path again are populated by trees and will provide screening to the proposed installation. The area is dominated by the extremely large electricity pylons, the proposal will be dwarfed by these large structures.

Figure 1 (Access Track):



Figure 2 (Proposed Location):



Figure 3 captures the previously refused site which was deemed to be too open and the revised location which benefits from being shielded by tree cover:



The applicant is fully aware that the site sits within the Kent Downs AONB and as such great care has been taken in the siting of a mast in the target area. The area is undulating with wooded valleys proving unsuitable for the placing of a site to achieve the required Emergency Services coverage. This greatly limits options. The proposed site located in close proximity to trees and bushes and large electricity pylons will reduce the prominence of the structure on the AONB. This area of the AONB needs coverage improvement for the Emergency Services, there is no scope to move the mast outside of the AONB. After reviewing the industry site database, it was identified that there were no existing telecoms towers within the local vicinity that could be investigated as a possible site share. Due to the rural local and surrounding topography no existing building/structure would be capable of providing the required height for our technical requirements.

In light of the operators' efforts to design the best solution for this particular site, so as to minimise the impact of the development on the environment, it is considered that the

appearance of the installation would not seriously impact on the visual amenity of the area, nor would it form an obtrusive feature within the landscape.

Local Planning Authority: Gravesham Borough Council

Development Plan: Gravesham Local Plan Core Strategy (2014) / Gravesham Local Plan 2nd Review (Saved Policies) (2006).

Site and its surrounds

Policy Relevant to the Development Site:

Gravesham Borough Council does not have a specific telecoms policy. This, together with the NPPF is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the NPPF. The search area is within the Kent Downs AONB and as such great care has been taken in the siting of a mast in the target area. The area is undulating with wooded valleys proving unsuitable for the placing of a site to achieve the required coverage. This greatly limits options. The proposed site located in close proximity to trees and bushes and large electricity pylons will reduce the prominence of the structure on the AONB.

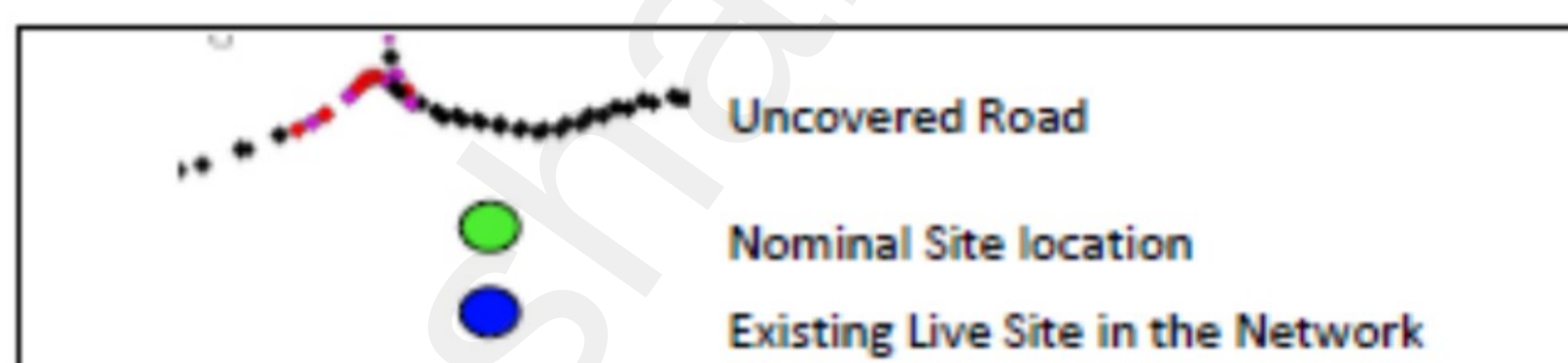
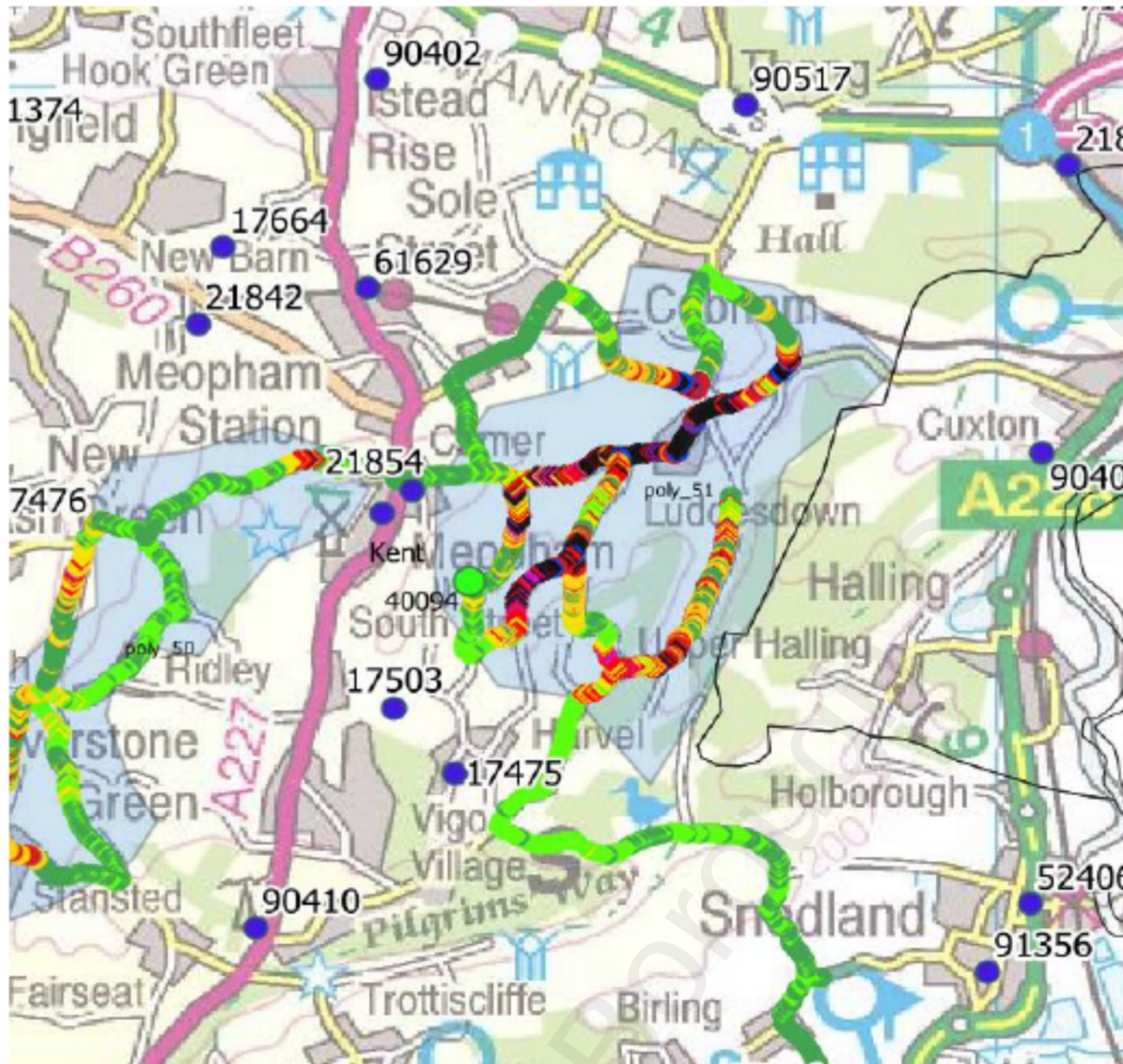
Policy Analysis: This scheme seeks to ensure the scale and mass of the design is sympathetic to its surrounds, being at the lowest feasible height, yet delivering the level of service needed in this location. As such it is considered the proposed development would accord with the principles of the Development Plan policies (in particular Objectives identified in paragraphs 4.2.27 and 5.4.4 of the Core Strategy). It fully accords with the requirements of the NPPF.

Enclosed map showing the cell centre and adjoining cells:

Radio Coverage Plots have also been included with this application. The information below illustrates the roads that will be covered for the Emergency Services.

OS Map Indicating Surrounding Planned Sites (not to scale)

Cell 70485



Reproduced from the 1997 Ordnance Survey 1:50 000 Scale Landranger map with the permission of The Controller of Her Majesty's Stationary Office, Crown copyright Mercury Personal Communications, Borehamwood, Herts, Licence No. AL 51286A0001

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA upon request.

Type of Structure	
Description:	
PROPOSED 27.5m 30H TOWER ON NEW PAD FOUNDATION. PROPOSED CONTROLLIS M48 PERMANENT GENERATOR ON NEW CONCRETE BASE. PROPOSED SATELLITE BACKHAUL DISH ON 2.44m HIGH 114.3 DIA CHS POLE ON NEW CONCRETE FOUNDATION. PROPOSED EE 300mm WIDE HIGH LEVEL CABLE LADDER ON 2No. 114.3 GANTRY SUPPORT POLES. PROPOSED EE FURO CABINET, EE EMERSON M35 POWER & BATTERY CABINET & EE VIPER CABINET INSTALLED ON TOWER BASE. PROPOSED 2.0m HIGH CLOSED BOARD FENCE C/W 3m WIDE DOUBLE ACCESS GATE.	
Overall Height: 27.5m AGL	
Height of existing building	N/A
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	See drawings
Equipment housing – type of material and external colour:	See Drawings

Reasons for choice of design:
The proposed installation is an EE (UK) Limited installation. The Emergency Services utilise the EE network. In keeping with the National Planning Policy Framework (NPPF July 2021) guidelines of using high quality communications infrastructure the proposed design has been selected to minimise visual impact upon the sensitive locations that the mast is situated in. The applicant fully appreciates the sensitivities of these sites, but all locations urgently need improved coverage and thus the site specifics are set if the targeted roads and areas are to be covered for the Emergency Services.

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP 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. When determining compliance the emissions from all mobile phone network operators on the site are taken into account.		

5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. Further detail regarding the general operation of the network can be found in the accompanying document entitled 'General Background Information on Radio Network Development for Planning Applications'. This information is provided to assist the local planning authority in understanding any technical constraints on the location of the proposed development.

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

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

THE PREVIOUS SITE ALSO NOW BEEN DISCOUNTED:

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- The proposed telecommunications station by virtue of introducing a large alien structure onto a prevalent position on the apex of Cobhambury Hill with open vistas onto the Kent Downs Area of Outstanding Natural Beauty (AONB) will cause detrimental harm to the quality of the landscape and would fail to either conserve or enhance the natural beauty of the Kent Downs. Therefore, the development fails to comply with Kent Downs AONB management plan policies SD1, SD8 and AEU14, is contrary to Sections 13 and 15 of the National Planning Policy Framework (2019) as well as Policy CS12 of Gravesham's Local Plan Core Strategy (2014).*

Site Type	Site Name and Address	NGR	Reason for not choosing
	Cobhambury Road	E: 567266, N: 68221	Suggested on pre-search as suitable however upon visit this stretch of road down to the junction with Batt's Road is overlooked by the nearby properties. It also does not have the same level of elevation as the options, reducing the efficacy of a site here.
	Henley Street	E: 567282, N: 166892	Suggested on pre-search however upon visit found to be too low in elevation to reach the target area, as well as being much closer to dwellings than the options provided rendering it further unsuitable.
	Luddesdown Hamlet Centre	E: 566960, N: 166278	Too low in elevation and with dense tall trees which would further limit the coverage possible from a mast being sited in this area. Close to dwellings and their private accesses, further reducing suitability.
	Brimstone Hill	E: 565225, N: 164972	Close to the nominal, this option and the surrounding area is discounted due to the lanes being narrow and heavily wooded with properties overlooking the more open fields in the area.
	Whitehill Road	E: 564679, N: 165208	Unsuitable due to being in the valley bottom and close to a private gated compound. A mast here would not provide the required coverage and dense wooded areas in the vicinity would further limit this.

If no alternative site options have been investigated, please explain why:

N/A

7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for EE (UK) Limited & ESN to expand their respective telecommunications network across Kent specifically in this instance to enhance coverage levels and network capacity within the DA13 area.

This partnership has resulted in the development and production of an array of "dual user" structures and cabinets, which have the ability to accommodate both operator's antenna systems and radio equipment.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using

their mobiles in their homes, and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

DEVELOPMENT PLAN POLICY.

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, it is stated that:

“Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise.”

NATIONAL PLANNING POLICY

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2021) sets out the Government’s planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their accountable Councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

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

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

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

NPPF Paragraph 14 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. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be

delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)."

It continues in Paragraph 115:

"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."

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded this will always adhered to before a new proposal is put forward for consideration.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116:

"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."

Conclusion

We consider that the development is compliant with the council's policy and that in accordance with Section 38 (6) of the Planning and Compensation Act 2004 permission should be granted for the installation.

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Policy Framework and Council's Local Plan Policies.

(Damian Hosker BA(Hons) MA MRTPI)

Planning Consultant

Email: d.hosker@whptelecoms.com

Contact Details

Name: (Agent)	Damian Hosker BA(Hons) MA MRTPI	Telephone:	
Operator:	EE (UK) Limited & (ESN)	Fax no:	N/A
Address:	WHP Telecoms Helena House Troy Mills Troy Road Leeds LS18 5GN	Email Address:	d.hosker@whptelecoms.com
Signed:		Date:	12 th August 2021
Position:	Principal Planner	Company:	WHP
		(on behalf of above operator)	