

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Colewood	Site Address:	Colewood New Knights Place Rochester Kent ME2 2TZ
NGR:	E: 570666 N: 169210		
Site Ref Number:	GVM026	Site Type: Macro	Upgrade

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

Written offer of pre-application consultation:	Yes
Was there pre-application contact?	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning

Summary of outcome/Main issues raised:

No comments had been received in respect to the proposals.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber		
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.			
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/colleges in close proximity to the proposed location.
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

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:	18 th November 2021	

3. Proposed Development

The proposed site: There is now a requirement to upgrade the existing equipment at Colewood, New Knights Place, Rochester, Kent, ME2 2TZ to provide improved coverage and capacity, most notably in relation to 5G services. This proposal Options are extremely limited and the only viable solution that minimises amenity issues has been put forward. There are no other viable alternative options other than to upgrade the existing installation. Discounted options were put forward and assessed at the original planning application stage and this was deemed to be the most
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appropriate location. Given the height that is required for this site sharing 5G upgrade there is a lack of available rooftops.

Three are in the process of building out the UK's fastest 5G network. Three has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and able to handle more data. To bring this new technology to the people Hutchison 3G UK Ltd will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use and that sometimes not all existing sites can be upgraded. In this area there is an acute need for a new mast to deliver the above.

It should be noted however, that the nature of 5G and the network services it provides, means the equipment and antennas required are quite different to the previous, and existing, service requirements. In particular, the nature of the antennas, and the separation required from other items of associated equipment, is such that it cannot utilise some existing structures that provide an installation for another operator, most notably in a street works or highways environment.

This equipment is considered unlikely to have any material impact on the local area but significant connectivity improvements which is a material consideration in the judgment of the site's suitability. Figure 1 & 2 illustrates the existing site and its surroundings. It is important to note that this is an existing site, thus meaning the LPA have already deemed this an acceptable location to house telecommunications equipment. The existing site is located west of the M2 surrounded by a vast amount of mature tree planting, which provides screening.

Figure 1:

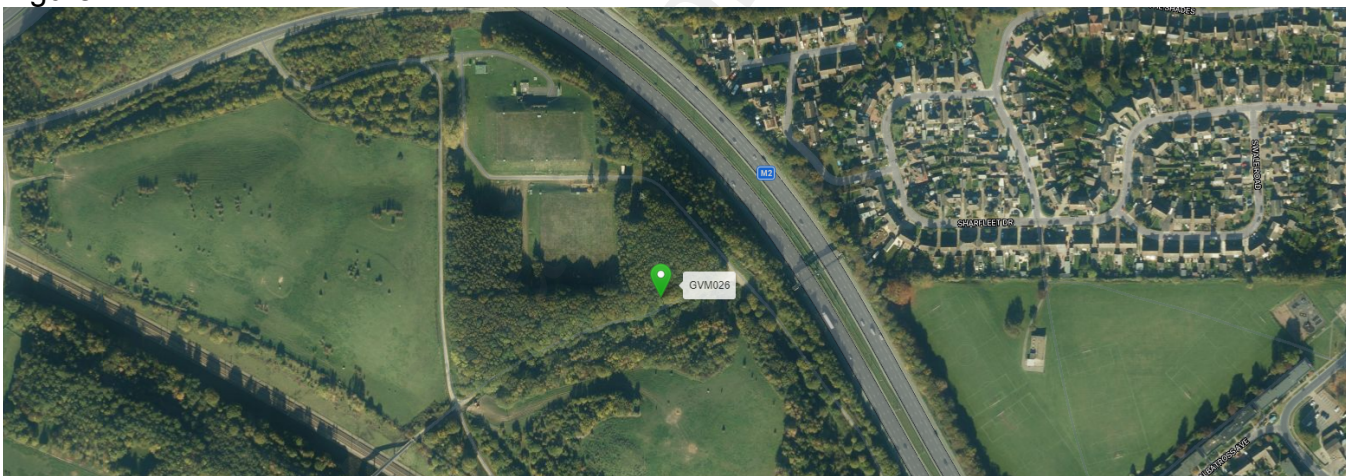


Figure 2:



Policy Analysis:

Local Planning Authority: Gravesham Borough Council

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

Policy Relevant to the Development Site:

The site is designated as being within the green belt and Kent Downs AONB, with urban/ rural uses to the north, east, south and west. The site is to be a material consideration.

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.

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.

This application is a Prior Approval Application and thus any debate around the Green Belt is not applicable for the reasons captured above by the Planning Inspectorate.

This application includes two recent appeal decisions that capture the endorsement of Prior Approval Applications in the Green Belt Appeal Ref: APP/K3605/W/19/3243050 & APP/G5180/W/19/3240742.

Please see the two areas captured by the Inspector in relation to Green Belts

The Council has also raised the issue of the mast being positioned within the Green Belt. Under Class A of Part 16 of Schedule 2 of the General Permitted Development Order (GPDO) 2015, the only issues which can be considered in respect of a prior approval application for telecommunications equipment are siting and appearance. Accordingly, the principle of development is not a consideration and the question of whether or not the proposal represents inappropriate development in the Green belt does not arise. Notwithstanding this, the slender mast would not result in any discernible loss of openness to the Green Belt.

Although the appeal site is within the Metropolitan Green Belt and much of the evidence relates to the analysis of this matter, the only issues that I can consider in respect of a prior approval appeal for telecommunications equipment are siting and appearance. Accordingly, the principle of development is not a consideration and the question of whether or not the proposal represents inappropriate development in the Green Belt does not arise.

The Government has set targets that the UK has blanket mobile coverage or as close to that as possible. Given the Green Belt covers large swathes of the UK it would be impossible to achieve this target without masts being located in the Green Belt. The Emergency Services

use the EE network and thus the need is clear and pronounced. The need for coverage in the Green Belt is an exceptional circumstance if mobile phone infrastructure is deemed “inappropriate”.

The industry would claim however, that installations are not inappropriate. Masts do not affect the openness of the Green Belt

138. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The proposed development would meet these requirements, and would certainly maintain the essential openness of the Green Belt.

Paragraph 137 of the NPPF relates to planning considerations and exceptional circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

The proposed development would meet these requirements, and would certainly maintain the essential openness of the Green Belt.

Any development that is not detailed in Green Belt paragraphs of the NPPF would be deemed inappropriate in the Green Belt by default, and in such circumstances would be ‘harmful’ to the Green Belt and should be refused unless there are ‘Very Special Circumstances’ that justify the development proposed.

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area; but are vitally necessary to ensure improved delivery of service. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the Development Plan policies. It fully accords with the requirements of the NPPF.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. 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” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

The presence of the existing column sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site

sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

Any other proposal to satisfy the identified requirement would result in the addition of a separate ground-based column elsewhere in close proximity to the existing structure. In our opinion, such a proposal would, in this instance, unnecessarily add to the clutter in this location and result in a greater visual impact.

As previously stated, the proposed site is an established telecommunication installation. This submission is purely to upgrade this existing telecoms installation with new equipment to facilitate 5G coverage.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be an intensification in the amount of equipment it is felt that such a minor increase would not detract from the character in which the proposal sits.

Enclosed map showing the cell centre and adjoining cells:

This can be emailed to the LPA on request.

Type of Structure

Description:

EXISTING EE/H3G 3No. HUAWEI AQU4518R0 ANTENNAS ON EXISTING LATTICE TOWER LEG C/W EE/H3G 3No. 18/21 MHA TO BE REMOVED AND REPLACED WITH PROPOSED H3G 1No. MAS64 INTEGRATED ANTENNAS TO BE INSTALLED ON PROPOSED 3No. 3.0m LONG CHS SUPPORT POLES FIXED TO EXISTING LATTICE TOWER LEG USING PROPOSED 6No. Z-BRACKETS (2No. PER SECTOR). EXISTING EE/H3G 3No. E15R02P11 MHA (800), EE 3No. E15S09P75 MHA (1800) & EE 3No. 2600 MHA TO REMAIN.

PROPOSED H3G 3No. ACTIVE ROUTERS, 1No. REMOTE FIBRE BOB & 1No. REMOTE DC BOB TO BE INSTALLED ON PROPOSED 3No. 3.0m CHS SUPPORT POLES.

PROPOSED H3G 1No. GPS NODE TO BE FIXED 200mm ABOVE ON EXISTING GANTRY POLE USING STANDARD MOUNTING KIT.

PROPOSED H3G 3No. 2012 ERS (1400), 3No. RD0840-H4-04 PASSIVE ROUTERS & 3No. FILTERS (1400) (TOTAL ACROSS ALL SECTORS) MOUNTED ON FLAMINGO RAIL FIXED TO CABLE LADDER SUPPORT POLE.

EXISTING H3G SAMO CABINET ON CONCRETE BASE C/W L1800, L800 MODULES & 3No. 2kW RECTIFIERS TO BE REMOVED AND REPLACED WITH PROPOSED H3G eHYBRID RACK C/W BBUs, PSU, 3No. 4480 ERS (18/21), 3No. 2460 ERS (800) AND TX.

EXISTING EE/H3G 450mm WIDE CABLE LADDER ON GANTRY POLES TO SUPPORT EXISTING FEEDERS.

EXISTING EE/H3G 450MM WIDE CABLE LADDER ON GANTRY POLES TO SUPPORT EXISTING AND PROPOSED COAX AND DC/FIBRE.

Overall Height: +23.55m 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 sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. 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 street scene..

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. The site is required to provide enhanced coverage for H3G LTE.

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.

DISCOUNTED OPTIONS:

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

The NPPF is clear that LPAs should not question the need for the installation.

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.

This is an upgrade to existing sites thus no other standalone new facilities have been investigated. In line with the sequential site selection process this proposal is to upgrade an existing site and not a new additional mast. A new additional mast to facilitate the upgrade would not be in line with NPPF, as stated by upgrading the current facility the most sequentially preferable option has been progressed.

The current siting was agreed by the LPA as the most appropriate location when the original installation was approved by the Council. Discounted options were supplied with the original planning submission and thus the principle of the siting is already established.

7. Additional Relevant Information

Background to the Proposal

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.

Siting

We have considered the detailed siting and design carefully to ensure that the scheme has a limited impact on the locality and general visual amenity.

Visual appearance

We would repeat that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is limited.

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 2019) 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:

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. 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 113:

"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. In this instance there is no scope to upgrade an existing mast nor site share.

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.

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Contact Details

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Signed:		Date:	19 th November 2021
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	