

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	Milton Place SW	Site Address:	Milton Place
NGR:	E565201, N174044		(jct between Milton Place and Ordnance Road), Gravesend DA12 2BT
Site Ref Number:	GVM20702	Site Type:	Proposed 5G telecoms installation: 20m high Streetpole and 3no cabinets with ancillary works.

2. Pre-Application Check List

Site Selection

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

Pre-application consultation with Gravesham Borough Council

Written offer of pre-application consultation:	N/a
Was there pre-application contact:	Yes
Date of pre-application contact:	22 nd April 2022
Name of contact:	Local Planning Authority and Ward Members – by email

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities.

An e-mail has been sent to Gravesham Borough Council with details of the proposed site.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

Amber

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an amber rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 as well as the objectives of the National Planning Policy Framework (2021).

Full details of the scheme are outlined within the planning drawings (ENF20327).

H3G consider a 'Streetworks' installation positioned upon the adopted highway (footpath), is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for Gravesham Borough Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th August 2020.

School/College

Location of site in relation to school/college:

Chantry Community Academy is situated approximately 120 metres from the site.

Outline of consultation carried out with school/college:

Email communication was sent to the school. The correspondence included a set of drawings and site detail sheet to explain the requirement for the proposed base station.

Summary of outcome/Main issues raised:

To the best of my knowledge, no response has been received.

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 th April 2022	

3. Proposed Development

The proposed site:
The proposed solution involves erecting a new 20m high H3G Phase 8 Street Pole installation upon the footpath adjacent to the junction of Milton Place and Ordnance Road, Gravesend, DA12 2BT, (E565201, N174044). The technical details of this proposal are illustrated within the enclosed application design drawings:- GVM20702_GVM078_85418_DA0563_GA_REV_A It is recognised that the very nature of installing new 5G communications infrastructure within a dense urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

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

The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward.

The site selection process has also been influenced by the topography of the area, trees, pavements, buildings and vertical elements of street furniture distributed around the vicinity of the site, including street lighting columns.

The installation shall sit towards the rear of a very wide area of pavement, adjacent to existing street furniture including cabinets and will back onto some large deciduous trees, which should soften any visual impact. Furthermore, while the design itself is typical of street furniture found in such urban locations, particular care has been taken to ensure the location will have a minimal visual impact upon the many properties within the surrounding area, which the apparatus will ultimately serve.

The equipment is considered unlikely to have any material impact on the local area, however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, while a detailed site evaluation in line with the National Planning Policy, has helped shape this application.

In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited. Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 3). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage.

The cell search areas for 5G are very constrained, with a typical cell radius of 50 metres. In this particular instance, the search area is centred around Milton Road and Ordnance Road. The area is characterised by many traditional buildings which front onto the street. Properties within the area are typically formed over 3 and 4 storeys. Many locations have been explored and discounted due to limiting factors including narrow pavements and proximity to listed buildings. Nevertheless and notwithstanding the various characteristics of this particular area, due to the operational parameters of 5G, moving the search area or seeking a location a long way from the search area is generally not operationally feasible. The position of the target/search area is also governed by existing/live Hutchison 3G 'Three' sites within the wider locality. Details of the operational sites are outlined within Figure 2. To minimise visual impact while achieving the operational requirements of H3G 'Three', the application site is situated on the north-eastern edge of the target/search area. Further details of the target/search area are included within Section 5 & 6 of this document, along with other locations that have been discounted.

Due to the position of the site towards the back of a particularly wide area of footpath, the passing clearance that will be retained for pedestrians, the presence of adjacent street furniture, including lamp posts, the setting against the adjacent trees and nature of the equipment itself, which includes a slim-line telecommunications pole, the application site is considered the single most appropriate location to support service delivery through a 20 metre Streetpole, with equipment cabinets typical of control boxes commonly found upon the adopted highway. To blend in with the surrounding street furniture, the pole and cabinets will be painted blue in colour (RAL 5010). Please note, the equipment can be painted to the requirements of Gravesham Borough Council.

To minimise impact upon the adjacent footpath, particularly when the equipment is being serviced or maintained, the cabinet doors will open 180 degrees.

Figure 1 – Extract from Google Streetview (view looking north-east) from the junction of Milton Place and Ordnance Road

Aspect includes street furniture, trees and buildings



The proposed site is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected Streetworks pole height and associated antenna and ground-based cabinets restricted to the absolute minimum, which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is situated in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective, as set out in the undernoted planning analysis:

Planning Policy Relevant to the Development Site:

Development Plan Policy: National Planning Policy Framework (July 2021)

The Gravesham Local Plan Core Strategy (September 2014) has been reviewed and no specific policies were identified in relation to telecommunications development. It is noted that a previous policy U2 – New Telecommunications Development, has been deleted. However, page 201 of the document emphasises the importance of super-fast broadband within the region, which is a key aspect of what our proposed development aims to deliver.

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

In this instance, a new 20m high H3G Phase 8 Streetpole with associated 3no. equipment cabinets are to be positioned upon the adopted public highway (footpath), to reduce visual impact in a residential setting. For the reasons listed above, the proposed site and scheme is not considered to pose an undue onerous material consideration and favourable determination is invited.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

Policy Analysis:

Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 126) 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 streetscape by integrating with the existing built environment.

The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area (shown as a white marker) and existing H3G (Three) UK sites are illustrated within Figure 2 below:

Figure 2 – Coverage Map: The proposed installation must be located close to the white marker (ref: GVM20702).



Type of Structure

Description:

Proposed Phase 8 Monopole c/w wraparound Cabinet at base.

Overall Height:	20m 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:	Phase 8 Monopole, colour Blue 5010
Equipment housing - type of material and external colour:	Profile steel cladding, colour Blue 5010

Reasons for choice of design:
The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will support the UK Government Digital connectivity vision and provide a basis for support from Gravesham Borough Council to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities. In accordance with the requirement set within National Planning Policy Framework (July 2021) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.

4. Technical Information

ICNIRP Declaration attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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.	Yes	
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5. Technical Justification

Reason(s) why site required
The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it important to explain the positive technical justification for the site and how the facility fits into the overall network. The site is required to provide new 5G coverage for H3G LTE, improving service in and around Milton Place and Ordnance Road. As outlined above, the cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale (Refer to Figure 2).

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

Discounted Options

In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground 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 Mast Data register is always examined prior to the submission of a planning application.

Discounted Options and National Planning Policy:

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

Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A Street Pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated in Figure 3, together with site locations that were investigated and subsequently discounted.

Discounted Options:

Site	NGR	Discounted Reason
D1 Milton Place	E 565213, N 174151	The pavements around this section of Milton Place are considered too narrow for the required telecommunications equipment.
D2 Milton Road (1)	E 565004, N 174068	Notwithstanding the nature of the proposed scheme (pole and cabinets), the location sits close to a listed building. As a result, discreetly positioning the apparatus on the corner of Milton Place and Ordnance Road alongside street furniture and a backdrop of trees, is considered to be more appropriate in terms of planning and operational requirements.
D3 Ordnance Road	E 565390, N 174089	This section of Ordnance Road is situated close to Chantry Community Academy where there is anticipated to be higher levels of pedestrian footfall. The proposed site on the corner of Milton Place and Ordnance Road is situated at the back of a wide section of pavement which should minimise any impact to pedestrians.
D4 Wellington Street	E 565124, N 173928	The location sits close to a railway bridge which would present difficulties in deploying the required apparatus, particularly due to the requirement for a tower foundation and other infrastructure to service the site including underground electricity and communications cables.
D5 Milton Road (2)	E 565292, N 173955	The pavements around this section of Milton Road are considered too narrow for the required telecommunications equipment.
D6 Parrock Street	E 564888, N 174106	Notwithstanding the nature of the proposed scheme (pole and cabinets), the location sits close to a listed building. As a result, discreetly positioning the apparatus on the corner of Milton Place and Ordnance Road alongside street furniture and a backdrop of trees, is considered to be more appropriate in terms of planning and operational requirements.
D7 Existing Mast infrastructure	N/a	Existing mast infrastructure approximately 0.6km to the south-east and 0.3km to the west of the search area. The installations are not capable of hosting additional equipment which could extend into this particular search area, where there is a gap in network coverage. As a consequence, the sites have been discounted.

Figure 3 – Proposed Site Location: 100m DSA (Desired Search Area) shown circled



7. Additional Relevant Information

Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across Stevenage and specifically in this instance, to enhance 5G coverage levels in and around Milton Place and Ordinance Road.

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

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

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, 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 representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own 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 area. Chapter 10 of the NPPF outlines the Government's support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 114 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 be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 118.

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

Gravesham Borough Council

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed 20 metre-high streetpole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation 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. In this particular instance, following an initial desktop survey and subsequent physical search of the intended target/search area, due to the characteristics of the area, the nature of the proposed equipment, location (wide footpath), existing street furniture and adjacent trees, after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, while significantly improving communications within the local vicinity.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework and the aims of the Gravesham Local Plan Core Strategy, which recognises the necessity for high-speed connectivity within the region.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

Contact Details

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Signed:		Date:	29 th April 2022
Position:	Senior Surveyor	Company:	Dot Surveying
		(on behalf of above operator)	