

Delegated Report

Telecommunication Works Application

Planning Application No: 20251193

Location: Arqiva Transmitting Station Palmer Avenue Gravesend Kent

Description: The Electronic Communications Code (Conditions and restrictions) Regulations 2017 (as amended) - Regulation 5 Notice of intention to relocation of 1 No antenna @ 18.1m onto existing support pole, replacement of 3No antennas @ 18.1m on 2.5m long poles, installation of 1No GPS node @ 3.1m, removal of 1No BTS3900L cabinet, replacement of 1No cabinet with 1No D-Airo Cabinet, removal of 6No MHA and 3No RRHs, Installation of 6No Routers, 3No MHA's, 1No BOB and associated Ancillary equipment

Applicant: Louise Martin, Dot Surveying Ltd

Site Visit Date: Desktop Assessment

Submitted Documents/Plans

- Dot Surveying Covering Letter – dated 24th November 2025;
- Drawing No. 10149-00-000-MD022 Rev 22 – Site Plan Existing;
- Drawing No. 10149-02-100-MD022 Rev 22 – Site Plan Proposed;
- Drawing No. 10149-00-002-MD002 Rev 22 – Elevation Existing West;
- Drawing No. 10149-02-150-MD022 Rev 22 – Site Elevation Proposed
- Drawing No. 10149-02-102-MD022 Rev 22 – Cabin Layout Proposed; and
- Drawing No. 10149-02-154-MD022 Rev 22 – Tower Plan Proposed.

Relevant Planning History

Reference	Description	Decision	Decision Date
20230425	The Electronic Communications Code (Conditions and restrictions) Regulations 2003 (as amended) - Regulation 5 Notice of Intention for the replacement of 3 antennas with 6 new antennas and ancillary development.	No Objection	12.05.2023
20010816	Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for an additional equipment cabin and meter cabinet in connection with the proposed sharing of the site with One 2 One.	Telecomm - Prior Approval not required	07.12.2001
20000690	Application for determination pursuant to Part 24 Class A of the Town and Country Planning (General Permitted Development) Order 1995 as to whether prior approval is required for the erection of 3 no. dual polar antennae and a 0.4m dish antenna mounted on existing mast, an equipment cabin on a raised platform and a meter cabinet.	Telecomm - Prior Approval not required	26.10.2000

19990505	Application for prior approval for construction of an equipment cabin and a meter cabinet and addition of 3 no. dual polar antenna and 1 no. dish antenna to existing mast.	Telecomm - Prior Approval not required	18.08.1999
19830323	Erection of 25m high television relay tower and single storey equipment kiosk	Permitted	27.06.1983

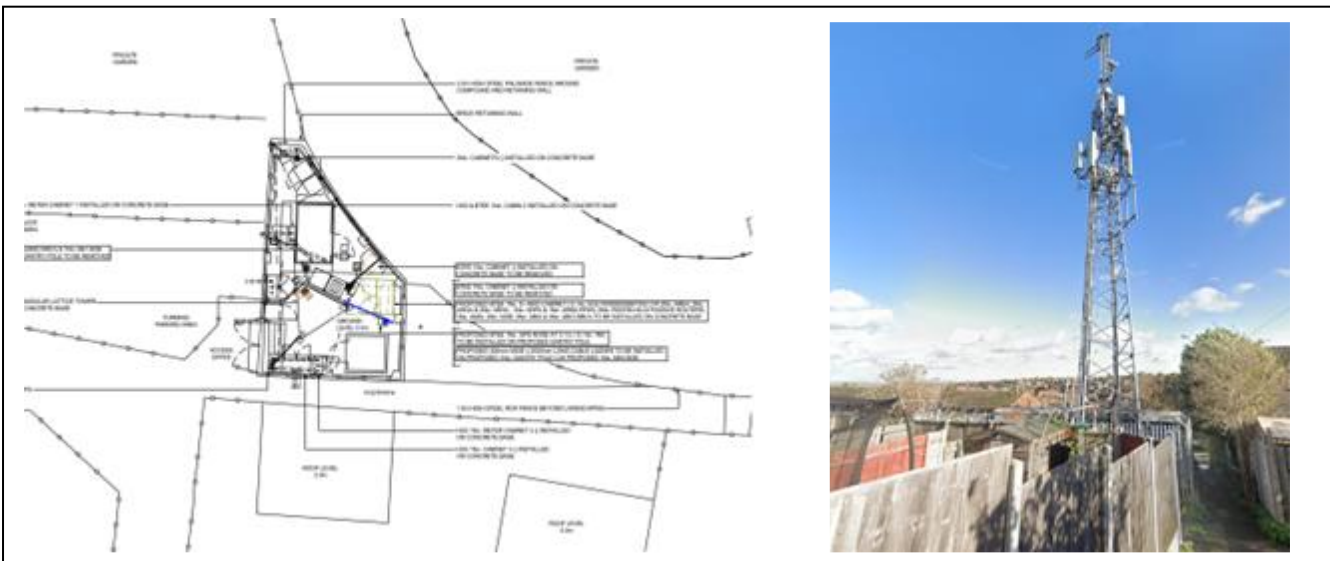
Site Description

The application site is Arqiva Transmitting Station, Palmer Avenue, Gravesend.

Proposed Development

This is a 28day Regulation 5 Notice for the;

- Relocation of 1 No antenna @ 18.1m onto existing support pole
- Replacement of 3No antennas @ 18.1m on 2.5m long poles
- Installation of 1No GPS node @ 3.1m
- Removal of 1No BTS3900L cabinet
- Replacement of 1No cabinet with 1No D-Airo Cabinet
- Removal of 6No MHA and 3No RRHs
- Installation of 6No Routers, 3No MHA's, 1No BOB and associated Ancillary equipment



Google Earth Satellite Image



Analysis

Ground-based apparatus could be permitted development under Schedule 2, Part 16, Class A(a) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), specifically paragraph A.1 (1). This paragraph states that ground-based apparatus would not be permitted if:

(1) Development consisting of the installation, alteration or replacement of electronic communications apparatus (other than on a building) is not permitted by Class A(a) if—

(a) in the case of the installation of electronic communications apparatus (other than a mast), the apparatus, excluding any antenna, would exceed a height of 15 metres above ground level;

The proposal is for the upgrade of existing telecommunications apparatus comprising the relocation of 1no. antenna, replacement with 3no. antennas, installation of 1no. GPS node, removal of 1no. cabinet, replacement of 1no cabinet with 1no D-Airo cabinet, removal of 6no. MHA and 3no. RRHs and installation of 6no. routers, 3no MHAs and associated ancillary equipment. The antennas are located on the existing mast and therefore not applicable. Therefore, this falls below the maximum height requirement of A.1 (1) (a) of the GPDO.

(b) in the case of the alteration or replacement of electronic communications apparatus (other than a mast) that is already installed, the apparatus, excluding any antenna, would when altered or replaced exceed the height of the existing apparatus or a height of 15 metres above ground level, whichever is the greater;

The proposal is for upgrade to existing telecommunications on the existing mast and works within the existing enclosure. Therefore, this falls below the maximum height requirement of A.1 (1) (b) of the GPDO.

(c) in the case of the installation of a mast, the mast, excluding any antenna, would exceed a height of—

(i) 30 metres above ground level on unprotected land; or

(ii) 25 metres above ground level on article 2(3) land or land which is on a highway;

The proposed development is for the replacement with 3no. antennas and relocation of 1no. antenna which are located on the mast which does not the installation of a new mast. Therefore A.1 (1) (c) is not relevant.

(d) in the case of the alteration or replacement of a mast, the height of the mast, excluding any antenna, would when altered or replaced exceed the greater of the height of the existing mast or a height of—

(i) 30 metres above ground level on unprotected land; or

(ii) 25 metres above ground level on article 2(3) land or land which is on a highway; or

(e) in the case of the alteration or replacement of a mast—

(i) the mast is on any land which is, or is within, a site of special scientific interest; and

(ii) the mast would, when altered or replaced, exceed the original width of the mast by more than one third.

The proposed development is for the 3no. replacement antennas and relocation of 1no. antenna and does not include the installation of a mast. Therefore A.1 (1) (d) and (e) are not relevant.

(7) Development consisting of the installation, alteration or replacement of any electronic communications apparatus other than—

(a) a mast;

(b) an antenna;

(c) any apparatus which does not project above the level of the surface of the ground; or

(e) radio equipment housing,

is not permitted by Class A(a) if the ground or base area of the structure would exceed 1.5 square metres.

The proposal is for the upgrade of existing telecommunications apparatus comprising the relocation of 1no. antenna, replacement with 3no. antennas, installation of 1no. GPS node, removal of 1no. cabinet, replacement of 1no cabinet with 1no D-Airo cabinet, removal of 6no. MHA and 3no. RRHs and installation of 6no. routers, 3no MHAs and associated ancillary equipment, and therefore falls within the parameters of A.1 (7) (a) of the GPDO.

The conditions set out in paragraph A.3 (prior approval) do not apply to a proposal seeking to install a fixed line broadband telegraph pole (A.2(5)). However, the Local Planning Authority must determine whether the siting and appearance of the development is acceptable under A.2 (1) (a) and whether they wish to determine whether the prior approval of these matters is required.

The upgrade of the existing telecommunications base station and replacement of 3no. existing antenna and relocation of 1no. antenna and ancillary works in this location is considered acceptable. The application site is located to the rear of properties on Palmer Avenue within an existing enclosure and mast. Therefore, it is considered that the proposed upgrade of existing telecommunications apparatus comprising the relocation of 1no. antenna, replacement with 3no. antennas, installation of 1no. GPS node, removal of 1no. cabinet, replacement of 1no cabinet with 1no D-Airo cabinet, removal of 6no. MHA and 3no. RRHs and installation of 6no. routers, 3no MHAs and associated ancillary equipment will have no detrimental impact on the character or appearance of the area.

Conclusion

The proposed development is considered to comply with the parameters set out in Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Recommendation

No Objection

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	<i>A Cue</i>	Signed:	<i>R Hart</i>
Dated:	10 th December 2025	Dated:	10th December 2025