

PLANNING, DESIGN & ACCESS STATEMENT

**Erection and siting of fibre exchange
telecommunications infrastructure to provide a
full fibre (gigabit) to the premises service**

at

**Land at Kenwood Business
Centre, New Lane, Havant, PO9
2NH**

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1.0 Introduction

Murray Planning Associates has been instructed by CityFibre to prepare and submit a planning application for the installation of fibre exchange infrastructure necessary to operate a full fibre (gigabit) internet service in the town of Havant. The infrastructure is to be located on land within the Kenwood Business Park, to the north-east of the town centre of Havant.

The application has not been discussed with the Council through any pre-application enquiry.

This statement sets out 1) an assessment of the site context; 2) a summary of the relevant policy framework; 3) an assessment of the proposed development; followed by 4) conclusions based on the preceding sections.

This statement should be read in alongside the following documents and drawings:

- Site Location Plan
- Existing Site Plan
- Existing Site Elevations 1
- Existing Site Elevations 2
- Proposed Site Plan
- Proposed Elevations 1
- Proposed Elevations 2
- CIL Form
- Application Forms & Ownership Certificates

2.0 Site Context

The site comprises an area of previously developed land that is not currently in active use. The land is of no particular merit, being covered in gravel. The northern and eastern sides of the site are enclosed by chain link fencing.

The site lies within an urban setting, and within a large business/industrial park area, to the north-east of the town centre. The site lies within Kenwood Business Park, which lies to the east of New Lane. The application site lies towards the eastern end of the business park, beyond which a railway line provides a physical boundary between the business use to the west, and residential use to the east.



Aerial view of the site and surroundings, with the approximate boundaries of the application site annotated in red

The site is open in aspect to the west, and lies adjacent to a car park. There is built form to the south, with mostly substantial sized industrial/business use buildings. The site is more enclosed by greenery in the form of mature trees and landscaping to the north and east.



View from within the business park looking north-east at the application site and the surrounding greenery to the north and east boundaries

Relevant Planning History

A review of the planning application register reveals there have been a number of planning applications made within the Kenwood Business Park, although none since 2014. From a review, none of the previous planning applications appears to relate to the application site.

3.0 Planning Policy Assessment

Policy Context

The site is located within the jurisdiction of Havant Borough Council.

At a local level, planning policies are contained within the Havant Core Strategy (2011) and Havant Allocations (2014) documents. National planning policy in the form of the Revised National Planning Policy Framework is also of relevance.

There are also some Government national policies and documents relating to the provision of faster internet connections that are considered a material consideration in the assessment of this application.

Revised National Planning Policy Framework (NPPF, 2021)

Paragraph 2 of the NPPF notes that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

Paragraph 11 advises that decisions (on planning applications) should apply a presumption in favour of sustainable development. As such, development proposals that accord with the development plan should be approved without delay.

Section 10 sets out guidance relating to supporting high quality communications. Paragraph 114 notes that advance 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** (our emphasis).

Paragraph 115 notes that where new sites are required (for communications infrastructure), equipment should be sympathetically designed and camouflaged where appropriate.

Paragraph 118 advises that 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.

Local Planning Policy – Havant Borough Core Strategy (2011) & Havant Borough Allocations (2014)

In the context of the Havant Local Plan, the site lies within a settlement boundary and is not subject to any site constraints. The site and surroundings are not identified as protected employment land. The nearest land allocation is the protection of the allotments to the west of the business park.

The policies relevant to the site and the proposed development are CS2, CS16, CS17 and CS19 of the Core Strategy, and Policy AL1 of the Allocations Document. These policies are looked at in more detail below.

Policy CS2 – This policy relates to employment development. Part 8 of the policy notes that planning permission will be granted for development proposals that encourage smart economic growth and *promote advances in information and communications technologies* (our emphasis).

Policy CS16 - This policy provides general guidance on what constitutes good design, and lists several criteria that development proposals are required to comply with. The policy notes that development respond to the

local context and produce a positive relationship between buildings, street, and street spaces.

The location of development within a mixed use setting ensures the development does not look out of place for the context of the surroundings. The development will not be visible from the public realm. Only those working at the business park would have any sort of view of the development. The residential use to the east (beyond the railway line) is unlikely to ever see more than an isolated glimpse towards the site, due to the tree screening on the site boundary.

Overall, the design is considered appropriate, taking account of the location and surrounding development, and the advice contained within paragraph 113 of the National Planning Policy Framework, while also giving due weight to the considerable benefits the development will bring to residents and businesses of Havant.

Policy CS17 – This policy simply advises that development should take place within the urban settlement boundaries, and that development in countryside locations is generally restricted.

Policy CS19 – This policy relates to effective provision of infrastructure, including telecommunications infrastructure. The policy advises that infrastructure development will be supported subject to compliance with 9 criteria. Of the 9 criteria, only two are considered relevant to this proposal, those being criteria 1 and 6.

Criteria 1 requires that development makes the most effective use of existing infrastructure, including opportunities for co-location of facilities.

RESPONSE: The site will be operated by a company known as CityFibre. The company already operate a gigabit internet service in several towns and cities throughout the UK.

The site operator deploys full fibre optic cable from their exchange data centre into the premises, which is considered the most reliable and future proof method of delivering high speed internet. It can carry from 1 Gigabit to 10 Gigabits or more, ensuring the development is 'future proofed'.

As a private company, CityFibre are not able to share their infrastructure with competitors. This criteria is mainly aimed at mobile operators sharing mast sites. The infrastructure is needed to allow CityFibre to offer a higher speed internet service than any other provider in the local area and compete with the likes of BT, Virgin Media etc.

Criteria 6 seeks to ensure that new infrastructure supports the local economy.

RESPONSE: The proposed development will allow full fibre (to the premises) access across the entire Havant urban area.

High speed broadband is now recognised as a fourth vital utility supporting people and communities to further enable working, education, communications, healthcare and entertainment in the home during and beyond the Covid 19 pandemic. As such, the proposal will fully comply with the requirement of criteria 6 to support (and enhance) the local economy.

Policy AL1– This policy seeks to ensure that all development is sustainable, and advises the Council will support all proposals that make a positive social, economic and environmental contribution to community and business life.

Emerging Planning Policy

It is noted that the Council have submitted a new local plan (February 2021). The plan has limited weight until it becomes adopted.

A review of the Havant proposals map¹ reveals that the site now forms part of an allocation of protected employment land.

Emerging local plan policy C1 sets out more detail on the protection of established employment areas. The policy does allow alternative uses to employment where the use is of a scale which complements the function and operation of the established employment area.

It is considered that the proposal would comply with this requirement, being tucked away in a discrete corner of the employment use, while also providing a service that would benefit the surrounding business uses.

Other Policy Considerations

Central government are keen on ensuring that access to full fibre internet is sped up, and that Councils have their part to play in delivering the necessary infrastructure. This is detailed (among other documents) within the following:

1. Government press announcement 27/8/20²... "Government ministers are calling on local councils to help ensure people can access better broadband and mobile connectivity crucial to the UK's coronavirus recovery". A summary of this announcement is as follows:
 - Digital Infrastructure Minister Matt Warman and Local Government Minister Simon Clarke have today written to local authorities setting out how they can help boost gigabit broadband rollout and 5G mobile coverage.

¹ <https://www.havant.gov.uk/cd03-havant-bedhampton-and-leigh-park-policies-map-pdf-104-mb>

² <https://www.gov.uk/government/news/ministers-call-on-councils-to-help-deliver-digital-connectivity-ambitions>

- Government ministers are calling on local councils to help ensure people can access better broadband and mobile connectivity crucial to the UK's coronavirus recovery
- We want to help people get access to fast and reliable connectivity. It is a top priority for this government.
- Councils have a vital role to play in the rollout of digital infrastructure and while there is good work going on up and down the country, there is more we can do.

2. OFCOM (UK telecommunications regulator) "Supercharging investment in fibre broadband" announcement 8/1/20³, summarised as follows:

- As demand for internet data accelerates, the UK's infrastructure needs to be upgraded. Full-fibre broadband connections can deliver much faster speeds than copper – up to one gigabit per second. They are also up to five times more reliable, and less likely to slow down when lots of people use them at the same time.
- So today we are proposing new, flexible regulation that will help fuel a full-fibre future for the whole of the UK.
- Having a choice of networks has delivered significant benefits to people, such as innovation, better services and competitive prices. In 2017, we set out a range of pro-investment measures that kickstarted full fibre rollout by a range of broadband companies. Since then, full fibre coverage has trebled."

3. Government manifesto pledge - "The Future Telecoms Infrastructure Review - setting the UK's broadband targets" ⁴. A relevant extract notes that "*The aim is to see 15 million premises connected to full fibre by 2025, with coverage across all parts of the country by 2033*".

³ <https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2019/supercharging-investment-in-fibre-broadband>

⁴ <https://www.gov.uk/guidance/building-digital-uk#the-future-telecoms-infrastructure-review---setting-the-uks-broadband-targets>

4.0 The Proposed Development

The proposed development comprises the development of a fibre exchange. The development will serve the town of Havant and provide full fibre (gigabit) internet services to residents and businesses in the local area.

The applicant (CityFibre) are rolling out a gigabit network across the UK, with the aim of providing full fibre broadband to a number of the larger towns and cities in the UK.

The fibre exchange comprises the construction of 2x fibre optic cabin units to be installed on a concrete base. The cabins each measure approximately 12m x 3.6m, and are 3.4m in height. The proposal also requires an external metre cabinet and two emergency backup generators to be installed within the grounds of the fibre exchange.

The development requires air conditioning units to control the temperature within the cabins. In this case, there is a chiller unit mounted to the side of the container, with a further 3 condenser units (per cabin), and a small air conditioner to the north of each cabin.

The site will be enclosed by 2.4m high palisade fencing.

Principle of Development

The development lies within an urban area and within a defined settlement boundary. As such, development on the site is acceptable in principle, given the built up surroundings. Furthermore, the principle of development is also established by guidance within the National Planning Policy Framework (paragraph 114 in particular).

While the site lies within an employment area, the land is not currently protected for this purpose, though the emerging local plan may alter this. Nonetheless, the development does not result in the loss of any buildings in active employment use. The land on which the development is sited is also not in active use, with no obvious and apparent previous use.

In addition, other government policy not related to planning (detailed above) confirms the need for local authorities to encourage the growth of full fibre infrastructure.

Given the benefits of the proposal to the wider area, it is considered that the loss of a small piece of land within the business park can be accepted on principle in this instance.

Scale & Appearance

The scale of the proposed development would be single storey in height. The built development is kept to the smallest operational size possible. At around 86 sq m, the cabins are clearly small in scale in comparison with the built form of the surrounding buildings within the industrial estate.

The appearance is appropriate for the type of development proposed, while its impact has been reduced by ensuring development is partially screened from the surroundings by retaining the existing landscape features.

Visual Impact

The site does not lie in sensitive surroundings, so far as built form is concerned. The surroundings are of a typical industrial estate, with no buildings of any architectural merit in the area. There are also no public views towards the site.

As such, an industrial estate is an ideal location for development such as the proposed, given it will only have a limited visual impact compared with a more residential area, or more sensitive area such as within a conservation area.

Parking & Traffic Generation

Once operational, it is anticipated that on average, a maximum of two visits per week would be needed (1-2 hours per day on site) for general maintenance purposes. The level of traffic generated by the proposal is considered acceptable, and will barely be noticeable in comparison with the traffic movements associated with the various uses around the site.

Access to the site would be via the existing entrance to the business park off New Lane. From there, a one way private road leads through the business park, looping back on itself to the south of the main complex of buildings. In short, the development proposal will not prejudice the health and safety of pedestrians or vehicle movements within the business park.

Noise

Given the previously discussed traffic generation associated with the site, there will be little noise impact on the surroundings so far as traffic noise is concerned. The cabins will contain the noise of the equipment within.

The main source of noise output will derive from the air conditioning units. However, given the site surroundings are that of an industrial/business park, and the nearest residential (or other noise sensitive use) is some distance away, the site is not in a sensitive location so far as noise output is concerned.

5.0 Conclusions

The site is located in the urban area of Havant, and within a business park setting. The proposed development comprises the installation of fibre exchange infrastructure necessary to operate a gigabit full fibre internet service within the Havant area.

The proposed scheme accords with the relevant development control policies in the Havant Local Plan (Policy's CS2 and CS19 in particular), and aligns with the policies contained within the National Planning Policy Framework. There is a clear principle of development for full fibre infrastructure such as that proposed in this instance, both through planning policy and other government policy as detailed above.

The scale of development is small, in comparison with the form of the built-up surroundings. The appearance is typical for infrastructure such as this, and the visual impact of the development is limited due to the location within a business park. The site is also not visible from the public realm.

The site is not currently part of any allocation of protected employment land, though this may change as and when the emerging local plan comes to fruition. In any case, the proposal will not result in the loss of any land in active employment use. The development proposal can be considered ancillary to the business use of the surroundings, given the benefits the development will provide to the residents and businesses of the surrounding urban area.

In summary, it is considered that the proposals are appropriate, are supported by planning policy and will not impact upon any interests of acknowledged importance. The proposal will bring considerable benefits to the wider area, and we therefore conclude the proposed development should be supported by the Council accordingly.