# EIA Quality Mark Case Study

## Proposed Communications Masts at Richborough

### Key issues:

- The management approach to assessing the visual and heritage effects of each development, involving the District Council (as local planning authority), County Council and external consultants working for the two councils;

- How the visual and heritage effects were considered cumulatively, in light of there being two planning applications and other significant committed development; and

- How the negative impacts of the development were balanced against any benefits.

### Purpose of the project:

Nexux Planning was appointed by Dover District Council to consider two planning applications, each for a communications mast exceeding 300m in height, located very close to each other near to the small settlement of Richborough.

Each application was submitted by a different applicant, accompanied by a separate Environmental Statement.

The purpose of the project was to assess the planning merits of each application, including its environmental impacts, by itself and cumulatively with other projects in the vicinity, and to recommend how each should be determined by the Council’s Planning Committee.

### Description of the project:

Each site was located within in the open countryside, in the eastern part of Kent, close to the coastline. The prevailing landscaping is flat, being located on the historic edge of the Wantsum Channel that once separated the Isle of Thanet (Margate, Broadstairs and Ramsgate) from the mainland. The area has historic significance, including ancient Roman Fortifications.

The proposed development of each application comprised a three sided three-sided lattice mast with multiple guys spread out in three directions.

Each mast was in excess of 300m in height, which would have made it taller than The Shard building in London and one of the tallest structures in the UK.

On each mast would be a variety of dish antennas at various heights and orientation.

At ground level around each mast, various work and equipment were proposed, including equipment cabinets and power generators.
The purpose of each mast was the same - to establish an optical direct line of sight to a corresponding mast in Belgium, which would relay data between financial markets in London and Frankfurt.

Sensitive receptors in the area include:

- Richborough Fort Scheduled Monument
- Statutorily listed churches with tall spires/towers
- Heritage coastline
- Residential properties

**EIA Learning Outcomes**

**Lessons learnt:**

Where different organisations are assessing an Environmental Statement from a regulatory perspective, it is vital that there is detailed coordination from the outset.

This became evidently necessary as different consultees were using (i) different language to make the same point or (ii) the same language to make different points or (iii) had a slightly different approach between the two planning applications.

This lack of consistency made, at least to begin with the overall planning assessment of the developments extremely difficult; and posed major risks that should the applications end up at appeal, the approach taken by the local planning authority would be criticised.

Once the risks of this situation were understood, a meeting held between landscape and heritage consultees, led by Nexus Planning, to discuss how a better degree of consistency and accuracy in the use of language could be achieved.

As a result of this meeting, it became apparent that one reason for this inconsistency was because the two Environmental Statements were using different methodologies for their landscape and heritage chapters.

**Lessons learnt continued:**

In particular how visualisations were shown and the cumulative scenario addressed.

Once the best approach between the two applications was identified, the local planning authority went back to the applicants to ask for amendments to their methodology, to obtain suitable consistency.

This revised approach was very important in being able to attach a greater level of confidence and robustness to the assessment of the Environmental Statements. Critical because both applications were considered on a planning balance, with a number of benefits against harm of wider landscape and heritage assets.

Each planning application was eventually refused and, in some part due to the rigorous approach taken at the application stage, neither applicant lodged an appeal.

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