

Our ref: COL.MOD.UK.0004000

Date: 21/1/2025

The Chief Planning Officer
Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU

By email only: planning.validation@gravesham.gov.uk

Dear Sir/ Madam,

Cellnex UK and MBNL

Submission of an Application for Planning Permission

The installation of 3 no. replacement antenna and ancillary radio equipment, bracing between 0-35m and 1 no. GPS Module at existing lattice mast and 1 no. replacement Equipment Cabinet within compound and ancillary development thereto.

Inn On The Lake, Inn On The Lake Hotel, Off Watling Street (A2), Gravesend, Kent, DA12 3HB (NGR E: 567664 N:169820)

On behalf of Cellnex UK in conjunction with Mobile Broadband Network Limited (MBNL), we submit herewith an application for planning permission for the installation of a mobile base station upgrade at the above site.

We enclose the following:

- i. The completed planning application forms, including the relevant landownership and agricultural holdings certificates.
- ii. O.S. site plan scale (1:12500) Ref 00-004
- iii. Drawing nos.
02-000A Existing Site Layout
02-002A Existing Elevation

02-110A Proposed Site Plan
02-160A Proposed Elevation

- iv. Electronic payment in respect of the appropriate fee has been made via the portal.
- v. National Policy – Delivering Ultra Fast Broadband Mobile Connectivity
- vi. A certificate of ICNIRP compliance
- vii. Supporting Planning Statement.

The Proposed Development

The operators already provide coverage from an existing base station at this site but have a requirement to install the upgraded electronic communications apparatus referred to in this letter and shown in the submitted drawings improve coverage and capacity to the local area.

The deployment of upgraded equipment will utilise the Mobile Network Operators (MNOs) existing 3G and 4G networks such as the base station already existing at the application site and as a consequence, this particular technical requirement is not one that can be met on an alternative site.

The amount of development, its design and the location of the apparatus at this existing electronic communications site has been guided by the technical and operational requirements of the operators, having proper regard to minimise appearance.

Having regard to the nature and appearance of the structure as a whole, the proposed works have no adverse impact on its appearance. The electronic communications apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

The application site is located on the site of The Inn on the Lake Hotel and Events venue at the eastern edge of the hotel site within a fenced area. To the south of the site is the A2, where the mast provides signal coverage for road users travelling along a key corridor for commuters and local traffic. The A2 plays a crucial role in connecting communities between Kent and the Greater London area, and the mast's placement supports communication for residents, businesses, and travellers across this important regional network.

The site is on the edge of Shorne & Ashenbank Woods Site of Special Scientific Interest (SSSI) and is situated adjacent to a wooded landscape surrounding the site. The dense tree cover that surrounds the site provides a high degree of natural screening to the wider local area.

The existing slimline lattice mast is an established feature at this location, serving as critical infrastructure for communication needs in the area. The upgrades proposed for the mast will enhance its capacity without significantly altering its external appearance. The wooded

environment and surrounding landscape ensure that the upgrades will have minimal visual impact, particularly as the site is already integrated into this rural and protected setting.

The apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will therefore remain the same as the current arrangements via a turn-off from Darley Lodge Lane onto the Hotel and Events venue site, as detailed in the Location Plan. Further there is no impact upon the SSSI as the work is all contained within mast and the existing, established compound.

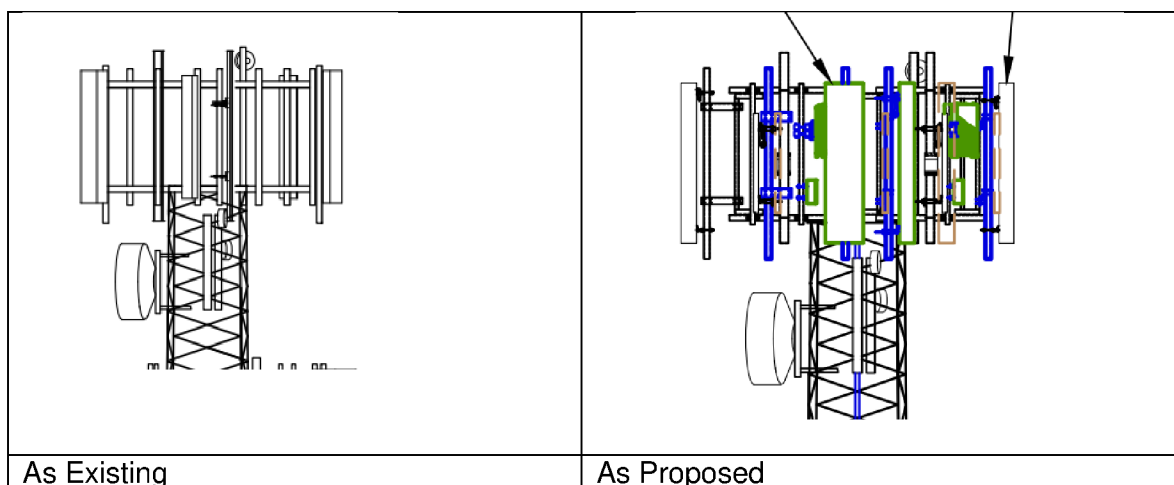
In accordance with all relevant health and safety regulations and guidelines, access to the site is restricted to authorised personnel and access for maintaining or servicing all the apparatus can only be carried out by properly trained and qualified staff. Such routine operations will continue to be carried out roughly once a quarter, with no requirement to increase this arising out of the development proposed. The application does not therefore give rise to any public issues associated with access.

As the apparatus proposed will lead to significant improvements to a public service provided in the local area, the application merits support and accords in all respects with national policy as set out in our supporting document '**National Policy – Delivering Ultra Fast Broadband Mobile Connectivity**', especially National Planning Policy Framework.

At a local level, the proposal has been considered against the Gravesham Local Plan Core Strategy, adopted September 2014. The document does not include a specific policy regarding Telecommunications, however acknowledges the need for improved communications within the Borough area, stating that there is a specific need to *“Provide super-fast broadband on all key sites borough-wide”* and *“To ensure that new residents and businesses have access to the latest technology; to improve competitiveness; to improve access to telecare/health, education and other public services; and to facilitate more flexible working practices.”*

The proposal accords entirely with the objectives of the Local Plan by supporting improved communications infrastructure within the Borough. The upgrades to the existing mast will enhance its capacity and ensure more reliable connectivity, which is essential for providing robust mobile coverage with only very minimal visual change with no substantial additional visual impact. This directly addresses the Local Plan's aim to *“Provide super-fast broadband on all key sites borough-wide”* and supports access to the latest technology for residents and businesses.

By improving connectivity, the proposal contributes to enhanced competitiveness for local businesses, better access to telecare/health services, education, and other public services. It also facilitates more flexible working practices, a key priority in modernising infrastructure to meet the evolving needs of the community. The mast upgrades will therefore play a vital role in achieving the Borough's strategic goals for communications and technology.



There is no increased width or height proposed, the works are all contained within the existing mast and headframe as illustrated in the above extracts from the plan which show replacement antenna at the existing headframe. The antenna which are to be removed are shown in brown hatched lines and replaced with slightly larger antenna shown in green, and supported with new steelwork show in blue. Further there is some bracing to the existing mast to strengthen the lattice but this will not substantially alter the visual appearance of the mast contained within the existing lattice structure.

The rural setting of the mast provides natural screening with dense woodland, further ensuring that any changes will not cause additional visual impact. The upgrade of the existing mast allows the service to the local area to be improved without the need for the development of an entirely new installation elsewhere.

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

The proposal has, therefore, been assessed using Traffic Light Rating Model in order to establish an appropriate level of engagement. The proposal has been categorised as 'green' and we therefore have not carried out any wider community engagement reflecting the minor nature of the works.

Health and Safety

Every installation on a site owned or managed by Cellnex UK will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

The ICNIRP guidelines seek to protect against the well-known thermal effects of radio

emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

We would be willing to meet to discuss the merits of the application, or to assist with any visits of the site and surrounding area, if this is beneficial to the determination of the application.

As the proposal entails the development of infrastructure necessary for the delivery of vital public services, we ask that you progress the determination of this application in an expeditious manner and request that you use your delegated powers if available.

We trust everything is in order, but please contact me if you require any additional information or clarification in relation to the proposed development.

Yours faithfully,

