

Town Planning Statement
5G Electronic Communications Base Station
At the Existing Cellnex UK Site

**INN ON THE LAKE,
OFF WATLING STREET,
GRAVESEND,
KENT,
DA12 3HB.
E: 567664, N: 169820.**

Site Reference - COL.MOD.UK.0005915

CELLNEX UK AND CTIL

October 2025

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operator (MNO) *Telefónica UK Ltd, in conjunction with Cornerstone*. The application site is owned / operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application, and these are referred to and should be read in conjunction with this statement.
- 1.4 For the avoidance of doubt, the proposed development is not coloured as per the submitted drawings. The equipment has been colour coated to differentiate what is existing, to be removed and proposed.

2. THE SITE AND SURROUNDING AREA

- 2.1 The site is located in a semi-rural area, adjacent to undeveloped woodland, large lakes, and a major road linking the city of London to the English Channel port of Dover in Kent. The development falls within Higham & Shorne Ward and Shorne Parish Council area with the nearest residential development being associated with Thong and Shorne villages. Despite its rural setting, the area experiences significant activity and a high demand for connectivity, which necessitates the planned upgrade works.
- 2.2 The proposed application site is understood to fall within heavily designated land, including the Metropolitan Green Belt, Kent Downs National Landscape and the Shorne and Ashenbank Woods Site of Special Scientific Interest (SSSI). The closest Heritage Assets to the site are the Grade II* Cobham Hall Registered Park and Gardens (National Heritage List entry number 1000182), which contains a number of Listed Buildings included the Grade I Listed Cobham Hall (List entry number 095053), the Grade II Listed The Mount (List entry 1096324) and a Scheduled Monument protecting the remains of a Romano-British Villa (List entry number 1012964). North Kent Woods and Downs National Nature Reserve also fall to the North of the proposed application site but due to the intervening distance from the site, the proposed works are not anticipated to cause any adverse impact.
- 2.3 There is a rich planning history to support the existing telecommunications development which has been in situ for almost 30 years. In the original planning application (Ref: 19920737), the committee report concluded that;

‘Bearing in mind the genuine need to site a radio mast here, the low visual impact the mast would have and taking into account the guidance within PPG 8 I find no overriding reason to refuse planning permission and accordingly recommend that planning permission be granted.’

3. THE PROPOSAL

3.1 The proposal is for the upgrade of the existing 35m telecommunications site that falls within ancillary land approximately 60m west of Inn on the Lake Hotel, off Watling Street, Shorne, Gravesend, Kent, DA12 3HB. It has been a long-established telecommunications site providing shared infrastructure presently used by Mobile Network Operators as part of their communications networks in this part of Kent.

3.2 The development proposed is shown in detail in the drawings submitted. The purpose of the upgrade is to facilitate the provision of essential new and improved coverage and service provisions. Such upgrades would usually be allowed under the Operator's permitted development rights, but it is understood that permitted development rights have been removed as per a previous planning approval, referenced 19980631. Condition 2 outlines;

'Notwithstanding the provisions of Schedule 2, Part 24 of the Town and Country Planning (General Permitted Development) Order 1995, or any other provision or enactment, the telecommunications mast, antenna or associated equipment shall not be enlarged or altered in any way without the prior written consent of the District Planning Authority. No additional antenna may be installed on the mast without the prior written consent of the District Planning Authority.'

3.3 The sharing of base stations between multiple operators is one of the key strategic policy principles. In keeping with the National Planning Policy Framework (NPPF) guidelines of using high quality communications infrastructure the proposed design has been selected to minimize visual impact. The proposal is compliant with the sequentially preferable solution as it involves upgrading an existing site rather than constructing a completely new base station.

3.4 The height of the mast means that its upper section is visible from some public vantage points, but the proposed solution is considered the least visually intrusive. The amount of equipment has been minimised to only what is strictly necessary, with no material increase to the tower's height or width proposed. The low level of visual change is further emphasised when considering the volume of equipment that is being removed. The surrounding area is lined with dense tree foliage which extends up to 23m AGL to create generous natural screening opportunities when viewed from encompassing directions.

- 3.5 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station. To help explain this important detail, we have set this out in the accompanying “**5G Technical Support**” document, which must be read in conjunction with this planning statement.
- 3.6 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document:
- *The installation of sector antennas on the mast with ancillary antenna support apparatus as well as the internal upgrade of ground-based radio equipment housing.*
- 3.7 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.
- 3.8 Paragraphs 16 and 17 of the Code of Practice for Wireless Network Development in England, published in March 2022, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements for 5G and the anticipated use of existing sites, including those owned by site infrastructure providers like Cellnex UK.
- 3.9 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications masts and sites, in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 The National Planning Policy Framework (NPPF) and the Code of Practice for Wireless Network Development in England require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received green when assessed against the traffic light rating model as referenced in the Code of Practice. This RAG influences the level of engagement that is required.
- 4.2 In our engagement letter to Gravesend Borough Council, issued on 18th September 2025, we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community and obtain your comments on the siting and design of the development. No response was received.
- 4.3 Our best practice engagement with the local community entailed sending letters and draft drawings to the local Ward Councillors for Higham & Shorne and Shorne Parish Council. To date no formal responses have been received from any of those consulted.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially the National Planning Policy Framework (NPPF);
- The local policy framework set out in the adopted Development Plan;
- The Kent Downs AONB Management Plan 2021-2026;
- The Code of Practice for Wireless Network Development in England.

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy - Delivering Ultra Fast Broadband Mobile Connectivity**' sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

The Need to Protect the Special Qualities of Designated Areas

5.4 The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact,

and the special qualities of nationally important landscapes such as National Parks and National Landscapes (formerly AONB).

- 5.5 However, there is now far greater emphasis that visual impact should not override significant radio planning requirements to achieve mobile coverage to a particular area, particularly with the need to support the massively growing and intensifying demand for mobile communications across the UK. Indeed, in terms of looking to meet operational needs, the NPPF now applies a reduced policy test compared to previous guidance. This helps clarify that an operator is only required to satisfy the normal test of acceptability having regard to all material planning circumstances, rather than looking for the 'optimum' solution as required under the former PPG8.
- 5.6 In balancing these requirements, the starting point for planning new networks or the expansion of existing networks is to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex UK. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended.
- 5.7 The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and wider landscape. The alterations to the mast are not considered to be a major development, it is relevant that it nonetheless satisfies the criteria that apply to such greater development under paragraph 183 of the NPPF. This advises that planning permission for major developments in a National Landscape should be refused except in exceptional circumstances where it can be demonstrated that they are in the wider public interest. Having regard to the three criteria listed:
 - The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - As explained, the target coverage area falls within the designated area and the special operational and technical requirements necessitate siting a mast within it;
 - All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case,

the alteration of an existing mast now an established and accepted feature within the landscape;

- The proposal to share this existing communication site looks to present an acceptable solution, particularly when compared with the alternative of erecting a new 5G base station elsewhere and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site within the designated area.

The Need to Protect the Green Belt

- 5.8 The application site lies within the Metropolitan Green Belt. While there is a general presumption in favour of allowing development for modern communications, this must be balanced against Green Belt protection policies and the special operational and technical requirements for siting base stations.
- 5.9 Electronic communications development is not explicitly listed as an acceptable use in the Green Belt under paragraph 154 of the NPPF, where a presumption against inappropriate development applies. However, such development is essentially an engineering operation and, in accordance with paragraph 155 of the NPPF, should not be treated as inappropriate where it preserves openness and does not conflict with the five purposes of including land within the Green Belt.
- 5.10 The proposal will not materially alter openness or reduce it further, and therefore should not be treated as inappropriate development. Even if openness were affected to a material degree, the operational needs of 5G and the wider public benefits of improved network coverage represent very special circumstances that outweigh any limited harm.
- 5.11 Concerns are further mitigated by the fact that no additional land take beyond the existing site boundary is required, ensuring that the development remains contained within the current footprint. Moreover, no preferable, suitable, and available sites

outside the Green Belt exist that would provide a better environmental solution, which itself constitutes very special circumstances.

- 5.12 In principle, the proposed development aligns with the relevant policy framework. The following section on Design Considerations demonstrates that the detailed design is also acceptable, supporting the presumption in favour of granting planning permission.

Local Policy Considerations

- 5.13 At local level, the proposal has been considered against the Gravesham Local Plan Core Strategy and the Development Plan for Gravesham. Gravesham Borough Council does not have a relevant telecommunications policy. Unfortunately, Policy U2 - '*New Telecommunications Development*' was not saved from the Gravesham Local Plan First Review 1994 and so, national planning policies prevail.

6. DESIGN CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 9 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations. Due regard has been given to the factors addressed from Paragraph 20 of the Code of Practice.

Physical Context

- 6.2 The site already accommodates a mast and related equipment, using an established telecoms site avoids the introduction of new infrastructure elsewhere. The principle of telecoms infrastructure is already established here. The site is owned and managed by Cellnex UK, meaning access, management, and upgrades can be secured without reliance on third parties. The development is contained within the existing site boundary meaning there is no further encroachment onto the Green Belt or open countryside. The site is well-placed in a strategic location to improve local coverage and capacity. Its elevation/topography allows for effective transmission without needing multiple alternative sites.

Amount, Design, Layout and Scale of the Development

- 6.3 The scale, layout and design of the development have been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above explained in detail in the **'5G Technical Support'** document.
- 6.4 The proposed installation of additional antennas represents a minor redevelopment of an existing, operational telecommunications site. As the site already accommodates a mast and associated infrastructure, the introduction of new antennas does not materially alter the established character or function of the site. In visual and spatial terms, the impact of the development remains largely unchanged, as the overall scale, height, and appearance of the existing mast will be maintained. The redevelopment is therefore consistent with national and local planning policies that support the upgrading of digital infrastructure while minimising environmental impact, and it

provides clear public benefits through improved connectivity with no greater harm to the surrounding environment.

6.5 With regard to the main component elements of the development proposed:

5G Mast design/or mode of building install

- The design of the proposed mast is led by operational and technical factors of 5G. Whilst the lattice structure proposed will be evident from near views, the latticework will help ameliorate presence over distance, especially from views where there are a background and foreground of vegetation. That said, the local topography will limit such views from public vantage points and any sensitive visual receptors.
- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is already existing and required for operational reasons. Compared to other forms of vertical infrastructure commonly found in rural landscapes, the mast proposed is a benign structure: it does not form a string of structures like pylons and it does not move like wind turbines, which are typically higher and usually developed in clusters.
- Alternative designs like shareable tree masts have been considered, but they cannot accommodate the amount of apparatus necessary to support 5G. The additional bulk associated with the decoration would also pose a greater structural concern. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

Antenna Array

- The numbers of antennas and dishes and their size have been kept to the minimum necessary to provide coverage and to link this site back into the operator's 5G network. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

- 6.6 Access to the site will continue to be provided by the existing entrance to the Inn on the Lake Hotel at Thong Lane and thereafter use the internal access routes through the car park of the hotel to the transmitting station compound. For the avoidance of doubt, these established routes do not require any alteration as part of the development proposed. The transmitting station compound is gated for high security purposes reflecting the importance of the electronic communications apparatus installed at the site.
- 6.7 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.8 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.9 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.

- 6.10 Its location within the surrounding built environment is favourable, as direct and front-facing views are minimised by the limited development, along with the orientation and fenestration of the adjacent hotel. Its non-domestic land use is advantageous, being generally less sensitive than residential or other high sensitivity uses.
- 6.11 The proposed location sits on the edge of the Kent Downs Area of Outstanding Natural Beauty, where the scenic qualities associated with the designation are considered somewhat diminished. The area's special qualities include diverse and varied landscapes, generally oriented east to west, striking coastal scenery, and relative tranquillity. The surrounding topography is gently undulating, with small rises and dips that influence local visibility. The most pronounced elevation differences occur to the South around Trosley Country Park and White Horse Wood Country Park, which is some distance away. The proposal is not near any coastal landscape, and the presence of the busy A2 reduces the sense of tranquillity.
- 6.12 Shorne and Ashenbank Woods Site of Special Scientific Interest (SSSI) is designated for its protected ancient woodland, diverse habitats such as wood pasture, and rare wildlife. The proposed application site is located on an area of hardstanding, and the proposed works are not at ground level. It is therefore anticipated that no harm will be caused to the protected trees or habitats through this upgrade.

Appearance

- 6.13 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above the local topography and natural features should help minimise views. Insofar as the mast and compound may be visible, they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.
- 6.14 Changes to the tower have been minimised as far as possible, a bulky headframe has been discounted for its increased dominance at a high elevation. The tower colour will also remain the same as this is what has been accepted by the Local Planning Authority and what locals have become accustomed to.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called '**5G Health and Safety**' which sets out in more detail the associated health and safety considerations. 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.
- 7.2 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.
- 7.3 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.

8. SUMMARY AND CONCLUSIONS

- 8.1. In summary, the application is in respect of electronic communications base station necessary to improve a vital network that provides public services.
- 8.2. The service provided by the operator is in the public interest and is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 111 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.
- 8.4. The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5. The operator has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.
 - Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
 - Engagement in accordance with the Code of Practice procedures.
 - An examination of design options to try and minimise potential visual impact.
- 8.6. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.7. This statement and the other accompanying material have demonstrated that the proposal is in accordance with local Development Plan policy and national policy set out in particular within the NPPF. In particular, it is a form of development that is

specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

- 8.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting approval applies.