



Delegated Report

Planning Application

Planning Application No: 20251001

Location: Communication Station adj Inn On The Lake Watling Street Shorne
Gravesend

Description: Removal of 6 antennas for the proposed installation of 3 antennas, 1 GPS module and internal refreshments to 3 cabinets with ancillary development.

Applicant: Cellnex

Site Visit Date: Desktop assessment

Submitted Documents/Plans

Application form
Planning covering letter dated 02.10.2025 and notice
Declaration of Conformity
Site Specific 5G Supporting Operational and Technical Justification
National Policy - Delivering Ultra-Fast Broadband Mobile Connectivity
5G Technical Considerations
5G Helping to Tackle Climate Change
5G Helping Deliver Health and Emergency Services
Planning Statement
5G Smart Cities
Drawing no. UKKE004790-03-151-MD024 Rev. 24 (Elevation)
Drawing no. UKKE004790-03-101-MD024 Rev. 24 (Site Plan)
Drawing no. UKKE004790-00-004-ML005 Rev. 5.A (Location Plan)
Drawing no. UKKE004790-00-010-ML005 Rev. 5.A (Legal Plan)

Relevant Planning History

Reference	Description	Decision	Decision Date
20250047	Removal of 3 no. antenna, 3 no. MHA & 1 no. Equipment Cabinet. Relocate: 5 no. Antenna & 2 no. MHA. Add: 3 no. Antenna, Tower bracing between 0-35m, 6 no. RRH, 6 no. BoB, 1 no. GPS Node & 2 no. Equipment Cabinet.	Permitted	20.03.2025
20240329	Works to antennas on existing tower including; Removal of 1no. dish antenna at 31.5m high, replaced with 1no. dish at 33.5m high and Relocation of 2no. dishes at 31.5m high to 29m high. Installation of 3no. ODU's (ancillary equipment).	Permitted	10.06.2024
20170055	The installation of two 1.0m diameter transmission dishes on the existing 35m high mast.	Permitted	28.03.2017
20160653	Installation of a 1.8 m diameter transmission dish and three 1.2 m diameter transmission dishes on the existing	Permitted	26.09.2016

	35m high mast.		
20030092	Installation of three antennae at a height of 27.5 metres on existing tower and ancillary works.	Permitted	18.03.2003
20000468	Application for variation of condition 2 of planning permission ref. No. GR/98/631 to allow for the erection of 2 no. dual polar antennas and 2 no. dish antennas onto existing mast and erection of radio equipment cabin.	Permitted	27.09.2000
19980631	Replacement of existing 30m high tower with one 35m high tower, complete with three dual polar antennas, twelve sector antennas, eight dish antennas and associated radio equipment housings	Telecomm - Prior Approval not required	04.12.1998
19920737	Erection of a 30m high steel lattice radio mast.	Permitted	30.03.1993

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC7 – Other Archaeological Sites
- T1 – Impact of Development on Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt land
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

- Gravesham Landscape Character Assessment (2009)
- Kent Downs AONB Management Plan 2021-2026
- Landscape Character Assessment Update 2020

Consultations, Publicity and Representations

External Consultees

The Kent Downs National Landscape team has seen a recent uplift in the number of consultations on planning applications. In accordance with the agreed Kent Downs Planning Protocol, which sets out that the Kent Downs Landscape team will only have a limited land use planning role and will prioritise its involvement in planning to planning policy matters, we will not normally provide bespoke comments on more

On 22 November 2023, all designated Areas of Outstanding Beauty (AONBs) in England and Wales were renamed 'National Landscapes' (NLs). Accordingly, the Kent Downs AONB is now the Kent Downs National Landscape. Its legal designation and policy status remain the same.

Also of note is the changes introduced through the Levelling-Up and Regeneration Act 2023, which came into force on 26/December 2023. The Act amends the Countryside and Rights of Way Act, which is the primary legislation relating to AONBs and replaces the previous Duty of Regard to AONBs set out at S85 with a new, strengthened requirement that:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. (Part 12 - Miscellaneous; Section 245. Protected Landscapes; paras (5) - (10).

This places a much stronger duty on relevant authorities, which includes local authorities, to ensure that their actions and decisions seek to conserve and enhance AONBs, marking a significant change to the legal context of AONB policy.

Further guidance is provided in Appendix 2.

On 22nd November 2023, all AONBs in England and Wales were renamed National Landscape s. The Kent Downs National Landscape is the new name for the Kent Downs AONB.

Beautiful, thriving landscapes that everyone feels part of. minor applications such as this. This does not imply support for, or objection to, the proposal. If our input would be particularly valued in this instance, please get in touch and we endeavour to provide informal advice where our current planning capacity allows.

In determining the application, the local planning authority has a new statutory duty, as set out above, to seek to further the purpose of conserving and enhancing the natural beauty of the Kent Downs National Landscape. Further advice on the new duty is provided in Appendix 2 of this letter. The Kent Downs National Landscape team recommends that to help fulfil the new statutory duty, the Local Planning Authority should ensure that the decision is consistent with relevant national and local planning policy and takes into account the aims, objectives and principles set out in the Kent Downs AONB Management Plan and its associated guidance documents. Further details of these are provided in Appendix 1.

Neighbouring properties

The application has been advertised on site. The overall consultation period expired on 21 November 2025.

No letters of representation have been received from neighbouring properties.

KCC Biodiversity, Shorne Parish Council and Local Ward Councillors were also consulted but no responses were received.

Officer's Analysis

Proposal

Planning permission is sought for the removal of 6 antennas for the proposed installation of 3 antennas, 1 GPS module and internal refreshments to 3 cabinets with ancillary development.

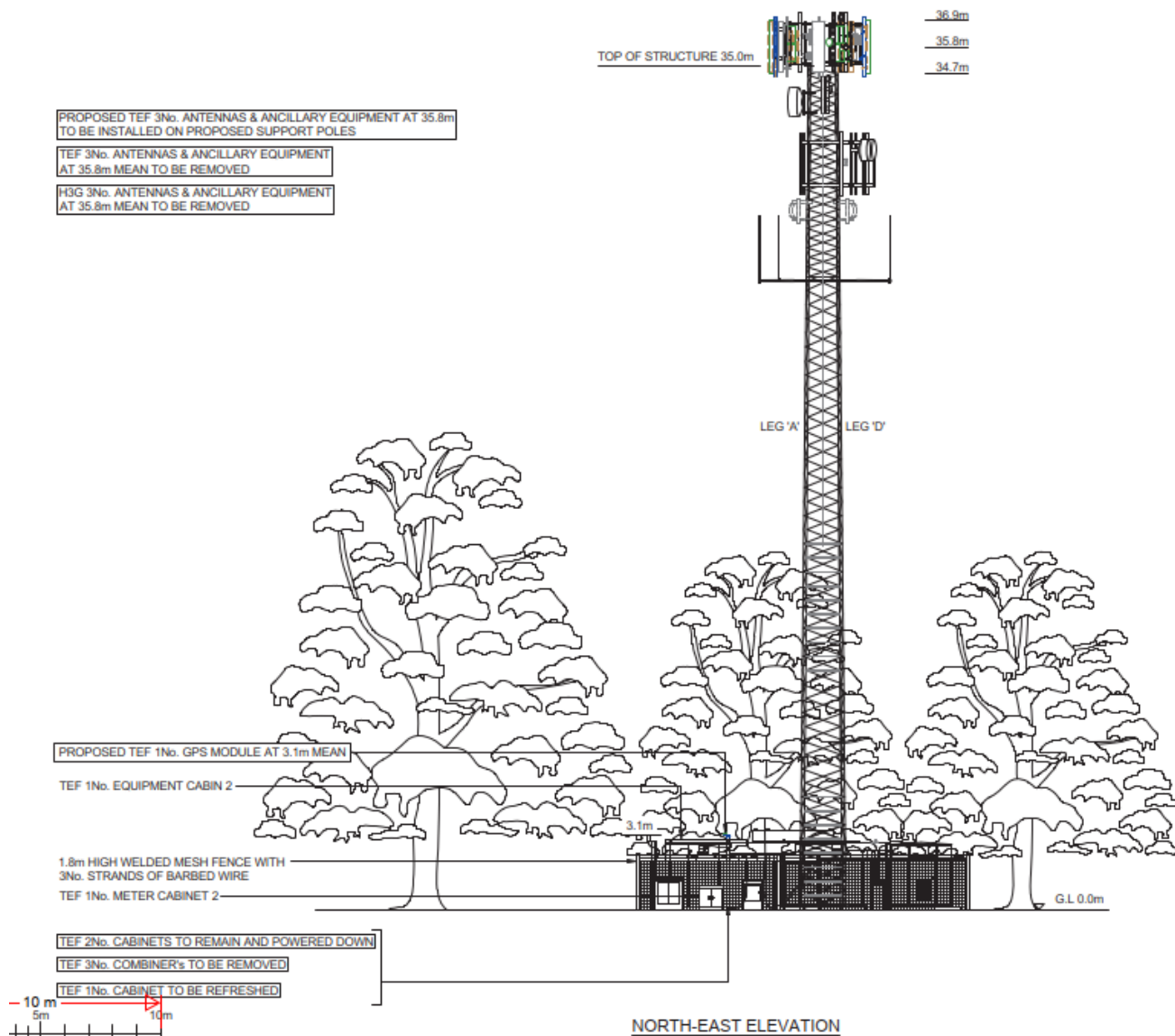
According to the Planning Statement, despite its rural setting, the area experiences significant activity and a high demand for connectivity, which necessitates the planned upgrade works.

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. This includes 3 antennas and ancillary equipment to be installed on proposed support poles on the mast at 35.8m, and 6 antennas and ancillary equipment to be removed at the same height.

At the base of the mast, there will be a GPS module up to 3.1m in height, an equipment cabin, a meter cabinet, and a 1.8m high welded mesh fence with 3 strands of barbed wire. Two existing cabinets will remain and be powered down, three combiners will be removed and one cabinet will be refreshed.

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 these rights have been removed as per a previous planning approval, reference 19980631.

Proposed Elevation:



Main Issues

The site is located in a semi-rural area, adjacent to undeveloped woodland, large lakes, and the A2. The nearest residential development lies in Thong and Shorne villages to the north and north-east respectively.

The application site has various designations, including the Metropolitan Green Belt, Kent Downs National Landscape, Shorne Woodland Landscape Character Area 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).

On the basis of the above designations, the main issues to consider with this proposal are as follows:

- Sustainability of the site
- Impact on the openness of the Green Belt
- Design and impact on character and appearance of the area
- Impact on the Kent Down National Landscape
- Residential Amenities.

Sustainability of the Site

The NPPF 2024 states that communication infrastructure is essential for economic growth and social wellbeing. Paragraph 119 states that planning decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

The NPPF also advises that the use of existing masts or other structures should be encouraged where possible, rather than creating new telecommunication sites. Paragraph 120 states that the use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.

Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

Paragraph 123 of the NPPF 2024 also advises 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.

The proposal to maintain and enhance the telecommunications provision on this existing mast would meet two of the three overarching objectives of the planning system in its goal of achieving sustainable development (Paragraph 8 of the NPPF 2024). The social and economic objectives would be met. Assessment therefore needs to be made as to whether the proposal would meet the remaining environmental objective. Redevelopment of this existing site would also be the preferred option over creation of a new site.

Impact on Green Belt

Policy CS02 of the Core Strategy 2014 prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy 2014.

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 142 of the NPPF 2024). Paragraph 153 of the NPPF 2024 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations

Any harm to the Green Belt should be given substantial weight. Development in the Green Belt is inappropriate unless either one of the exceptions in paragraph 154 applies (which they do not) or it would utilise grey belt and satisfy all three criteria set out in paragraph 155 of the NPPF 2024. In relation to the criteria in paragraph 155, the development would be on grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, thus criterion (a) of paragraph 155 is met.

In relation to criterion (b) of paragraph 155, which relates to a demonstrable unmet need, the submitted Planning Statement sets out the need for the delivery of 5G, which is in high demand with it being the next and highly significant advancement in mobile connectivity. There is also a supporting document, *National Policy – Delivering Ultra Fast Broadband Mobile Connectivity*, which sets out how 5G mobile connectivity will underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. A further supporting document, *5G – Helping Tackle Climate Change*, sets

out how modern connectivity such as 5G will be essential to help the Government meet its wider sustainability and climate change targets. This information supports the Government's aim to expand electronic communications networks for economic growth and social well-being, and would therefore meet this currently unmet need, and comply with the paragraph 155 (b) criterion.

The location of the site is sustainable, being immediately adjacent to the A2 with connections to London and the port of Dover. Access to the site will continue to be provided by the existing established entrance to the Inn on the Lake Hotel. Thus, criterion (c) is met.

The final criterion (d) only applies to housing development and therefore is not relevant.

On this basis, in line with paragraph 155 of the NPPF 2024, the proposal would not be regarded as inappropriate in the Green Belt.

Special Circumstances Case

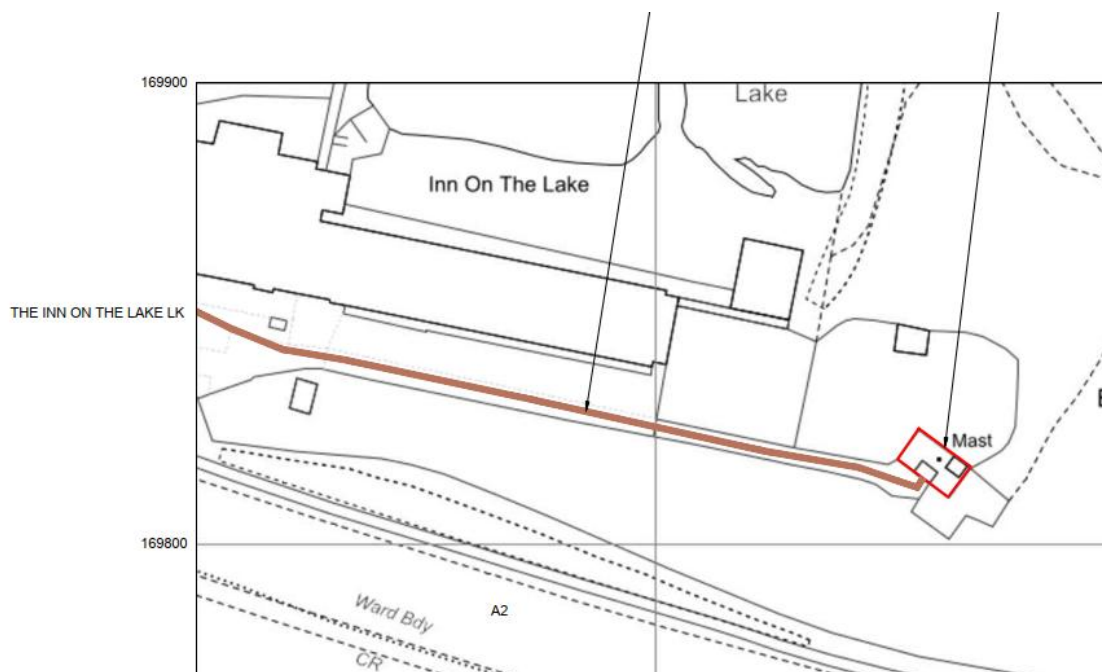
In this case, the operational needs of 5G and the wider public benefits of improved network coverage represent the very special circumstances that would outweigh any limited Green Belt harm in this location. There would be no development beyond the existing site boundary, and as this is an existing telecommunications site it would provide a better environmental solution to developing a new site. Whilst the proposed development is not regarded as inappropriate, these matters are considered to support a very special circumstances case that would weigh in support of the proposal and outweigh any Green Belt harm.

Green Belt Conclusion

The proposed development is not regarded as inappropriate in the Green Belt, plus it has the added benefits of aiding the expansion of electronic communication network and utilising an existing mast site to do so, and would therefore be in accordance with paragraphs 119, 120 and 155 of the NPPF 2024.

Design, Character and Appearance

The proposed site is to the east of the Inn on the Lake hotel to the north of the A2.





The Inn on the Lake hotel is located immediately adjacent the A2 and does not have a particularly special character or quality to it. The existing mast is a fairly prominent feature at the end of the car park:



There are longer views of the mast from the car park as per the following Google Earth image:



However, there is a line of trees along the southern boundary of the hotel, which restricts visibility from the A2 and the pedestrian route that runs alongside it. It is largely just the top of the mast that can be seen above the treeline from the A2:

View travelling west:



The site is located within the Kent Downs National Landscape and Shorne Woodland Landscape Character Area.

Paragraph 135 of the NPPF 2024 seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well-designed and respects the character and appearance of the surrounding area. With regard to the impact on the landscape, Policy CS12 of the Gravesham Core Strategy 2014 is relevant to this application, relating to green infrastructure. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment (GLCA) 2009 will be taken into account in determining applications.

Paragraph 187 of the NPPF 2024 aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

There is now a duty on Local Authorities under Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 to seek to further the statutory purposes of Protected Landscapes such as National Landscapes. This duty is intended to facilitate better outcomes for Protected Landscapes.

Reflective of paragraph 189 of the NPPF 2024, Policy SD2 of the Management Plan 2021-2026 recognises the need to conserve and enhance the local character, qualities, distinctiveness and natural resources of the AONB. Principle SD8 seeks to ensure that proposals do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the AONB. The Kent Downs National Landscape Position Statement states that scale, height, siting, use, materials and design are factors that will determine whether a development affects the natural beauty and special qualities of the Kent Downs National Landscape. Examples of adverse impacts on the setting of the Kent Downs National Landscape include: development which would have a significant impact on views in or

out of the National Landscape and the introduction of an abrupt change of landscape character.

Some of the key characteristics of the Shorne Woodlands Landscape Character Area are the undulating topography, chestnut coppice woodland and a strong sense of enclosure. The overall condition of the landscape is good and has moderate sensitivity. It is recommended that key landscape elements should be conserved and reinforced.

Whilst the mast is high and has some prominence from certain closer viewpoints, it is largely obscured from wider views. As the mast is existing and operational, and the proposal involves antennas being removed and replaced on the top of the existing mast, as well as ground level changes immediately around the base, the nature of the works are not considered to result in a significant impact on the landscape character, appearance and function of the area. The overall scale, height, and appearance of the existing mast will be maintained. In this respect the proposal is considered to comply with Policies CS12 and CS19 of the Core Strategy 2014 and the relevant requirements of the Gravesham Landscape Character Assessment (2009) and the Kent Downs AONB Management Plan 2021-2026 in relation to conserving landscape character.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts from pollution.

Paragraph 122(a) of the NPPF 2024 requires that the application be supported by the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area. In this instance, the site is not near a school or college, or within any other of the other consultation areas as described in this paragraph. Therefore, no consultation was necessary with these bodies.

As per paragraph 122(b) of the NPPF 2024, the applicant has submitted a Declaration of Conformity, which self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on the limitation of exposure of the general public to electromagnetic fields in all areas legitimately accessible to the public.

The proposed scheme would result in alterations to the antennas on the existing mast which would result in no greater number than existing. The impact on the adjoining hotel is likely to be minimal given the nature of the proposed works. There would be no significant impact on outlook, light or privacy from the proposal.

The proposal is considered to safeguard the amenity of residential properties in compliance with Policy CS19 of the Core Strategy 2014 and relevant NPPF paragraphs.

Parking and Highways

The site is located immediately adjacent to the A2 with connections to London and the port of Dover. Access to the site will continue to be provided by the existing established entrance to the Inn on the Lake Hotel and the established routes will not require any alterations as part of the proposal.

Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing by authorised personnel.

There would therefore be no adverse parking or highway issues resulting from the proposals, which would comply with Saved Policies T1 and T5 of the Local Plan First Review (1994) and Policies CS11 and CS19

of the Core Strategy 2014.

Any Other Material Planning Considerations

Impact on Heritage Assets

The NPPF 2024 places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 203). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 of the Local Plan 1994 sets out that for development involving alterations to listed buildings or affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building. Proposals must be sympathetic in terms of their appearance and materials. Saved Policy TC7 states that development on important archaeological sites will not normally be permitted.

As the proposal involves alterations to an existing mast, the overall scale, height, and appearance of which will be maintained, the proposal would not have any archaeological impact or impact on the setting of listed buildings, the closest of which lie some distance away to the south of the A2. In this respect the proposal complies with the relevant requirements of saved Policies TC2 and TC7 of the Local Plan 1994, Policy CS20 of the Core Strategy 2014 and Section 16 of the NPPF 2024.

Biodiversity

Paragraph 187 of the NPPF 2024 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity. Policy CS12 of the Core Strategy seeks to protect sites designated for their biodiversity value based on their level of importance and enhance, restore, recreate and maintain habitats particularly within Biodiversity Opportunity Areas, which is a designation of this site. It is also covered by the Shorne and Ashenbank Woods Site of Special Scientific Interest (SSSI). However, as the works involve alterations to an existing mast, there will be no new or additional habitat impacts and therefore the proposal would comply with the requirements of the aforementioned policies. Biodiversity net gain would also not be a requirement as the proposal would fall under the de minimis exemption, where development does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat, and 5 metres of linear habitats.

A restriction on any construction compound and lighting to protect biodiversity should be conditioned as with the previous application.

Conclusion

The proposed development is not regarded as inappropriate in the Green Belt, has the added benefits of aiding the expansion of electronic communication network in the public interest and utilising an existing mast site. The proposal would also be acceptable with regard to design, landscape, residential amenity, parking and highways, heritage asset and biodiversity impacts, and would therefore be in accordance with the requirements of paragraphs 116, 119, 120, 122, 135, 155, 187, 189 and 203 of the NPPF 2024, Policies CS02, CS11, CS12, CS19 and CS20 of the Core Strategy 2014 and saved Policies TC2, TC7 and T1 of the Local Plan First Review 1994.

Recommendation

Permission with conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
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Signed:	<i>K. Parkin</i>	Signed:	R Hart
Dated:	20th November 2025	Dated:	22nd November 2025