



Delegated Report

Planning Application

Planning Application No: 20250047

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

Description: 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.

Applicant: Cellnex UK

Site Visit Date: 13.02.25

Submitted Documents/Plans

Application Form
1490517-02-000-MD022 Rev A – Site Plan Existing
1490517-02-002-MD002 Rev A – Elevation Existing North East
1490517-00-004-ML005 Rev 5 – Location Plan
1490517-02-110-MD022 Rev A – Site Plan Proposed
1490517-02-161-MD022 Rev A – Antenna Plan Proposed
1490517-201-MD022 Rev A – Cabin Layout
1490517-241-MD022 Rev A – Antenna Plan Layout
Cover Letter
Planning Statement
Declaration of Conformity
National Policy Document
Drawing Register

Relevant Planning History

Reference	Description	Decision	Decision Date
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	08/03/2017
20160653	Installation of a 1.8 m diameter transmission dish and three 1.2 m diameter transmission dishes on the existing 35m high mast.	Permitted	26/09/2016
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	Permitted	27/09/2000

	existing mast and erection of radio equipment		
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Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS18 – Climate Change
- CS19 – Development & Design Principles

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 12 – Achieving Well-Designed Places

Supplementary Planning Guidance

- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- Kent Downs Area of Outstanding Natural Beauty Management Plan

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

Shorne Parish Council

No comments received.

GBC Licensing

No comment.

KCC Biodiversity

As the works are restricted to the existing footprint of the communication station, we are satisfied that no ecological information is required.

We note that the site is located within Shorne and Ashenbank Woods SSSI and therefore we advise the following:

- The works are carried out during daylight hours and no artificial lighting is used to carry out the works
- Any construction compound is located on existing hard standing and no vegetation is cleared to implement the works.

Kent Downs National Landscape Unit

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 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

1no. surrounding property was consulted and a site notice placed on 13th February 2025. No comments have been received from members of the public.

Officer's Analysis

- Sustainability
- Green Belt
- Design and Character of the Area
- Kent Down National Landscape
- Amenity

Sustainability

The NPPF (2024), indicates that the communication infrastructure is essential for economic growth and social wellbeing;

119. Advanced, 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. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

In this section the legislation continues, advising that the use of existing masts, or other structures should be encouraged where possible rather than creation of new telecommunication sites;

120. The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. 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.

It also advises that;

123. 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 therefore meet 2 of the 3 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.

Green Belt

Being located within the Green Belt, strict planning policies apply to protect the openness of the land which, as stated in the National Planning Policy Framework (NPPF), openness is an essential characteristic of such areas. To protect the openness and prevent urban sprawl into such areas, government planning guidance states that “inappropriate development” should not be approved except in very special circumstances. This national policy stance is reflected in saved Policy C13 of the Local Plan First Review, and includes most forms of new development.

Paragraph 153 of the NPPF (2024) explains that “inappropriate” development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 154 then explains that development in the Green Belt will be “inappropriate”, subject to a list of exceptions. This type of development is not included in the list of exceptions and is therefore considered inappropriate.

Paragraph 153 of the NPPF (2024) states;

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. 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.

In this case, the scale of the proposal is minor, and as the majority of the structure is in existence, the alterations proposed would not cause any further harm to the Green Belt.

Paragraph 119 states:

‘Advanced, 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.’

Paragraph 120 states:

‘Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.’

On balance, it is therefore considered that the proposed scheme would result in limited harm to the Green Belt and the benefits of the expansion of electronic communication networks and use of the existing mast, would be an exceptional circumstance which would outweigh the limited harm to the green belt in accordance with paragraphs 119, 120 and 153 of the NPPF (2024).

Design and Character of the Area

The proposed site is to the east of the Inn on the Lake and to the North of the A2. The site is not a visually attractive area, and the existing mast is a fairly prominent feature.

The existing mast is highly visible from the Inn on the Lake Car park as per the below image.



Existing Mast

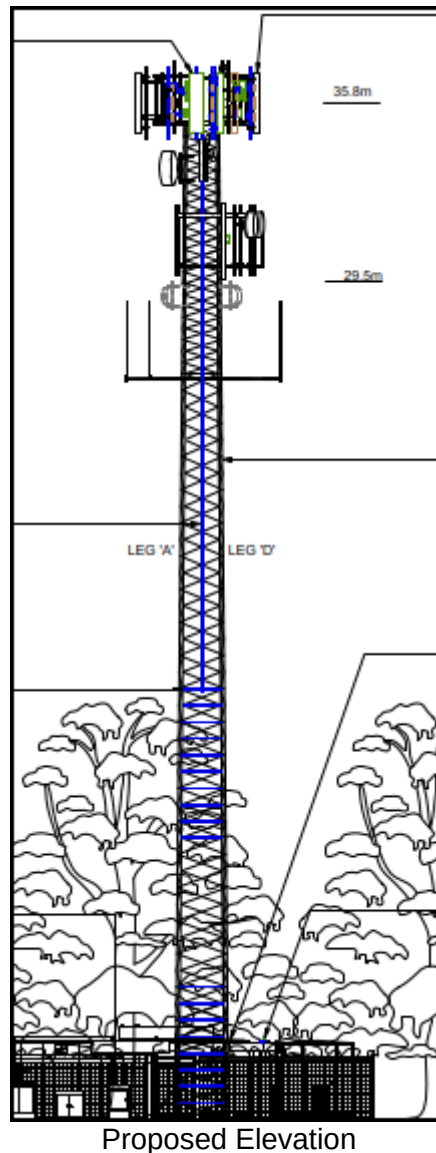
There are also some longer views of the mast from the west as per the following image:



Taken on site on 29th March 2024 from previous application.

However, there is a line of trees to the south which somewhat restricts visibility from both the pedestrian route and A2 road.

As viewed during the site visit, whilst the mast given its height has some prominence from certain viewpoints, it is somewhat obscured from the south. Given the high level of visibility this feeds into the assessment of the proposed changes and the wider impact the changes would have on the local character.



The works to the existing mast would include; Removal of 3 no. antenna, 3 no. MHA & 1 no. Equipment Cabinet. Relocate: 5 no. Antenna & 2 no. MHA. Add: 3 no. Antenna and addition of tower bracing, 6 no. RRH, 6 no. BoB, 1 no. GPS Node. Works also include 2no. equipment cabinets.

This would not result in significant impact on the character of the area given the limited nature of the works.

Kent Downs National Landscape

The application site is situated within the Kent Downs National Landscape (Formerly Area of Outstanding Natural Beauty). Part of the nationally important landscape of the Kent Downs National Landscape is located on the eastern side of the Borough and it extends from Shorne south to Vigo. It is designated because of its scarp slope and dry valleys which often retain a down land character and its woodlands are also highly valued. The views from the escarpment are also important. It is considered that great weight should be given to protecting the landscape and the National Landscape. The Kent Downs AONB Management Plan has been adopted by the Council. It sets out a clear vision, aims and policies for the conservation, management and enhancement of the National Landscape.

The site is located in the Kent Downs National Landscape and as such, it is necessary to consider the relevant policies.

SD1: The need to conserve and enhance the natural beauty of the Kent Downs National Landscape is recognised as the primary purpose of the designation and given the highest level of protection within statutory and other appropriate planning and development strategies and development control decisions.

SD2: The local character, qualities and distinctiveness of the Kent Downs National Landscape will be conserved and enhanced in the design, scale, setting and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements which are adopted as components of the AONB Management Plan.

SD3: New development or changes to land use will be opposed where they disregard or run counter to the primary purpose of the Kent Downs National Landscape.

SD8: Proposals which negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the National Landscape will be opposed unless they can be satisfactorily mitigated.

It is considered that there is no conflict between the Kent Downs National Landscape and the proposed scheme subject to suitable conditions.

On balance, the proposed development would comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF (2024) in terms of the impact on the National Landscape, design, character and appearance.

Amenity

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 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 have submitted a Declaration of Confirmity, 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 minor alterations to the dishes on the existing mast which would result in no greater number than existing. The impact on the adjoining inn is likely to be minimum given the minor nature of the proposed works.

The proposal is therefore considered to safeguard the amenity of neighbouring properties in compliance with policy CS19 of the Core Strategy 2014.

Conclusion

The proposed development complies with all relevant national and local planning policies.

Recommendation

The recommendation is to approve.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Richard Hart
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Signed:		Signed:	<i>R Hart</i>
Dated:	19th March 2025	Dated:	20th March 2025