

Our ref: P19-0093 (COL.MOD.UK.0002194)

02 April 2024

The Chief Planning Officer  
Gravesham Borough Council  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

**SUBMISSION VIA THE PLANNING PORTAL**

Dear Sir/Madam,

**Cellnex UK Ltd and DRW NX UK Ltd**  
**Submission of an Application for Planning Permission**  
**Installation of Telecommunications Apparatus**  
**Inn on the Lake Hotel, Off Watling Street (A2), Gravesend, Kent, DA12 3HB (National Grid**  
**Reference e: 567664 n: 169820)**

On behalf of Cellnex UK Ltd and DRW NX UK Ltd, we submit herewith an application for planning permission for the installation of mobile telecommunications equipment at the above reference site.

The application comprises:

- i. The completed planning application forms, including the relevant landownership and agricultural holdings certificates;
- ii. O.S. site plan drawing at scale 1:2500 showing the red line area with scale bar;
- iii. The following drawings:
  - a. Site Plan Existing (drg. 1490517-00-000-MD018 Rev. 18);
  - b. Elevation Existing (drg. 1490517-00-002-MD018 Rev 18);
  - c. Site Plan Proposed (drg. 1490517-32-100-MD019 Rev 19);
  - d. Elevation Proposed (drg. 1490517-32-150-MD019 Rev 19);
- iv. Electronic payment of the prescribed planning application fee; and
- v. A certificate of ICNIRP compliance.

**Context**

The application site relates to an existing lattice tower with a maximum height of 37m together with existing equipment cabins and cabinets which are set within the compound area. The site is within a National Landscape and is situated within the Shrone and Ashenbank Woods Site of

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Specific Scientific Interest (SSSI). Existing dishes are currently fixed to the tower together with existing antenna which are attached to the headframe. The compound is situated surrounded by hard surface land together with deciduous trees situated to the east and south. The Inn on the Lake Hotel is situated 55m to the west and there are no residential dwellings within close proximity.

The Councils online planning register indicates the following planning history for the site

- 20170055 – The installation of two 1.0m diameter transmission dishes on the existing 35m high mast – Approved March 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 – Approved September 2016
- 20040559 – Installation of two 2G and two 3G antennas together with two 0.6m diameter radio dishes on the existing telecommunications tower and two equipment cabinets at ground floor level – Approved July 2004
- 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 – Approved December 1998
- 19920737 – Erection of a 30m high steel lattice radio mast – Approved 1993

### **The Proposed Development**

The development proposed is shown in detail in the drawings submitted and is as follows:

“Existing 1No. 1.2m Dish at 31.5m to be removed and replaced with 1No. 1.2m Dish at 33.5m along with ancillary equipment”

The principle elements of the proposed development at the application site are:

- Existing 1No. 1.2m Dish at 31.5m to be removed and replaced with 1No. 1.2m Dish at 33.5m
- Installation of 3No. ODUs (Ancillary Equipment)
- Reserved 2No. 1.2m Dish to be relocated from 31.5m to 29m

In terms of site selection, the applicant has sought to upgrade an existing, established base station site, rather than propose a new site elsewhere in the wider surrounds.

### **Planning Policy**

The relevant planning policy comprises:

- The Development Plan, which comprises the adopted Gravesham Local Plan Core Strategy and those saved policies of the Gravesham Local Plan First Review that remain in force
- National Planning Policy Framework
- The Kent Downs AONB Management Plan 2021-2026



## Assessment

In assessing the development, it needs to be borne in mind that the works relate to the installation of replacement equipment at an existing base station. Aspects of the development, for example, the height of the proposed dish, are dictated by technical and operational considerations related to the need to provide an acceptable level of coverage to the local area.

The scale, layout and design of the development has 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. For example, the size of the dish is the maximum size required to provide the required level of coverage whilst minimising visual impact.

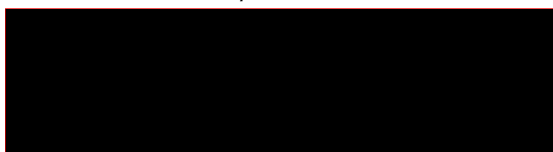
The scale of the apparatus is not large and when installed should look proportionate to the existing equipment. The dish proposed are very similar to the existing electronic communications apparatus installed and will not exceed the height of the existing equipment already in situ. They will therefore be seen in the context of the existing lattice tower and not appear as incongruous or jarring additions.

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.

Please also take this application and the details contained within it as 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.

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



Planner

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(Cellnex UK Ltd on behalf of DRW NX UK LTD)