Our ref: CellnexSS/ Downland TE/219222/MBFP

Date: 24th February 2021

Cllr Mario Creatura,
Coulsdon Ward,
c/o Town Hall,
Katharine Street,
Croydon,
CR0 1NX.

Sent Via e-mail: mario.creatura@croydon.gov.uk

Dear Cllr Creatura,

Vodafone Ltd and Telefónica UK Ltd

5G Mobile Connectivity - Industry Best Practice Informal Engagement

Installation of radio apparatus at Downland TE, Hollymeoak road, Coulsdon, Surrey, CR5 3QA. (Cellnex site ref: 163843, Project ref: 219222).

We write in connection with a proposal by Vodafone Ltd and Telefónica UK Ltd, in conjunction with Cornerstone Telecommunications Infrastructure Ltd (CTIL), to share the existing electronic communications site, which is managed by Cellnex.

There is a specific need for new apparatus to deliver 5G mobile connectivity to meet the Government's Digital Strategy and bring about the significant benefits associated with this advanced next generation mobile connectivity. The deployment of 5G will begin through utilising the MNOs existing 3G and 4G sites like this one and so for a period of time, sites are likely to carry different services in parallel, with intelligence applied to ensure high data uses operate through the higher capacity networks.

In this case the operators already have a base station operating from the site with services integrated into their wider mobile networks, so the option of developing an alternative site is not a realistic proposition as it would cause undue delay and disruption to 5G mobile connectivity in the area. The proposed development therefore entails replacing / installing onto the rooftop. The enclosed drawings provide further details of the siting and the design of the development.

It is important to emphasise that the provision of 5G requires more antennas due to the need to ensure resilient coverage and in some locations, particularly towns and cities, the operators may need additional antennas simply to meet network capacity requirements. The siting and design of 5G antennas is much more complicated than the deployment of previous generations of mobile connectivity. Some 5G antennas have new smart "tracking" features that necessitate antennas being either much closer to the building edge or more elevated than previous generations of apparatus. There has to be sufficient separation from existing apparatus to minimise radio interference and apparatus high enough on the building to avoid shadowing and antenna 'clipping' off the edge of the building.

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com

In addition to the above, 5G apparatus will operate at higher power levels than earlier generations and as such the apparatus will need to be elevated higher off building rooftops to ensure public exclusion zones can be maintained. Our application will be supported by the necessary ICNIRP declaration to demonstrate such compliance.

To help you understand these greater operational and technical constraints with 5G, which in turn determine the specific siting and design of the apparatus being brought forward at this site, we enclose a separate supporting document called ***'5G Technical Support'.*** Within this context, we consider that the proposed apparatus looks to satisfactorily balance these various operational considerations and still minimise the extent of visual influence associated with the development.

National Planning Policy

Planning policy is provided at the national level by the National Planning Policy Framework (NPPF). It is a material consideration in planning decisions. The NPPF directly addresses the need for enhanced wireless communication services, first mentioned in paragraph 20, which states that an LPA's strategic policies must make sufficient provision for:

> *"b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)"*

Leading on from this, paragraph 112 states that "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…..'

While supported in principle, paragraph 113 of the NPPF retains the requirement to minimise the number of installations consistent with the efficient operation of the network but also includes being consistent with the needs of consumers and providing reasonable capacity for future expansion. This is consistent with the guidance on siting and appearance principles set out in Appendix 1 of the *Code of Best Practice on Mobile Network Development in England (24 November 2016)*, with the sequential approach for operators including;

- Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator);
- Installation on existing buildings and structures;
- Erecting new ground-based masts;

The NPPF clearly acknowledges the benefits of modern electronic communications and seeks to encourage such development as being essential due to their role in supporting a modern economy, contributing to sustainable objectives, and enhancing local community access to a range of goods and services. Local planning authorities are advised to respond positively to proposals for electronic communications development and this must include an understanding of the associated special problems and technical

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com

needs of developing and upgrading communications networks. Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

While all development proposal will have some localised impacts, it is considered that in this instance any such impact would be minimal and therefore acceptable in the planning balance when considered alongside the benefits of providing the operators advanced 5G network coverage and the extent to which the proposal meets local and national town planning policies. Furthermore, Paragraph 116 of the NPPF states that *"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 proposed development therefore accords with all relevant aspects of the NPPF in respect of sustainable development and providing advanced, high quality and reliable communications infrastructure, while ensuring any resultant perceived visual impacts are minimal.

We look forward to receiving any comments you may have on this proposal. It would be greatly appreciated if you could forward your comments onto us direct within the next 14 days.

Yours faithfully

Martin Brown
Senior Planning Manager
m.brown@harlequin-group.com

Tel: 01506 721023
Mob: 07771 933 094

On behalf of Cellnex

Enc:
Drawing Numbers – **163843-22-120-MD024 (2of2), 163843-22-170-MD024 & 163843-00-004-ML001** – Location Plan**,**
5G Technical document

Harlequin Group Ltd
Rutland House
5 Allen Road
Livingston
West Lothian
EH54 6TQ
T:+44(0)1506 462174
www.harlequin-group.com