

**1 APPLICATION DETAILS**

Ref: 19/01515/FUL  
Location: Telecommunications Site, Simpson's Fisheries, Imperial House  
Redlands, Coulsdon, CR5 2HT  
Ward: Coulsdon Town  
Description: Removal of existing telecommunications mast and associated  
apparatus and equipment housing and the erection of  
replacement 25 metre high mast including 6 antennas and 4x600  
millimetre dish antennas and associated apparatus, 11  
equipment cabinets at ground level and associated ancillary  
works including perimeter fencing  
Drawing Nos: 1102511\_CDN062\_CR0032\_M001 Site Location Plan, Existing  
Site Plan, Existing Elevation, 215 Max Configuration Site Plan,  
Max Configuration Elevation  
Agent: Mr Steven Peck  
Case Officer: Louise Tucker

**1.1** This application is being reported to committee because the ward councillor (Cllr Clancy) made representations in accordance with the Committee Consideration Criteria and requested committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

**2 RECOMMENDATION**

- 2.1 That the Planning Committee resolve to GRANT full planning permission.
- 2.2 That the Director of Planning and Strategic Transport has delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

**Conditions**

- 1) The development shall be carried out wholly in accordance with the approved plans
- 2) Any other planning condition(s) considered necessary by the Director of Planning & Strategic Transport

**Informatives**

- 1) Any other informative(s) considered necessary by the Director of Planning & Strategic Transport

### 3 PROPOSAL AND LOCATION DETAILS

#### Proposal

- 3.1 Full planning permission is sought for the erection of a 25 metre high lattice telecommunications mast with 6 attached antennas and associated equipment cabinets and ancillary cabling at ground floor level, to replace an existing 20 metre high lattice mast in the same location.
- 3.2 The applicant states that the enlarged mast seeks to accommodate 5G coverage in the area and in view of the increased level of apparatus required to be installed, a more substantial lattice structure is required (with increased height to ensure that radio signals clear neighbouring trees and buildings).

#### Site and Surroundings



Image 1 – aerial view

- 3.3 The application site is located on the west side of Redlands, within the Marlpit Lane Industrial Estate. The immediate area is generally industrial in character, although residential properties are located approximately 150-200 metres to the east (situated at a significantly higher level and fronting onto Deepfield Way). To the west is a railway line, beyond which are various car showrooms fronting onto Farthing Way. The site is included within the designated Marlpit Lane Strategic Industrial Location. Approximately 1km to the south lies a designated Croydon Panorama (from Farthing Downs of Coulsdon).

## Planning History

- 3.4 A mast has been in place on site over a number of years (well before 2002). There were a number of applications to modify the mast (in 2002 and 2004) which received resolutions to grant (LBC Ref 02/00021/P and 04/01415/P) subject to S.106 Agreements which sought to secure that the mast be set aside for use by other operators and mobile networks. The files suggest that these S.106 Agreements were never completed and therefore the applications subsequently fell away. It appears from the site inspection that these works never took place – with currently three antenna attached to the existing lattice mast.

## 4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposed mast would help in the delivery of 5G technology and enhanced communication, supporting the expansion of electronic communications networks.
- The proposed installation is proposed within an established industrial area and situated a reasonable distance away from neighbouring residential properties.
- The existing lattice structure can already be viewed from surrounding sites and whilst the increased height and scale of the telecommunications installation (especially at the top of the mast) would be larger than that existing, in view of the neighbouring context and the appearance of the existing structure, the visual impact would be acceptable.
- The application has been accompanied by an ICNIRP Certificate which suitably satisfies International Guidelines associated with non-ionising radiation levels.

## 5 CONSULTATION RESPONSE

- 5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

## 6 LOCAL REPRESENTATION

- 6.1 The application has been publicised by way of letters sent to adjoining occupiers of the application site. The number of representations received from neighbours, local groups etc. in response to notification and publicity of the application were as follows:

No of individual responses: 12 Objecting: 12 Supporting: 0

No of petitions received: 1 with 42 signatures

- 6.2 The following issues were raised in representations. Those that are material to the determination of the application, are addressed in substance in the MATERIAL PLANNING CONSIDERATIONS section of this report:

Summary of objections	Response
Material issues	
The proposed mast is in close proximity to residential	Health considerations is considered in paragraphs 8.9-8.12

properties and is likely to be a health hazard	
There is scientific evidence from scientists and doctors who have demanded that the EU should ignore the ICNIRP Certification process, seeking a moratorium of 5G networks	Ditto above
5G towers are more dangerous than other cell towers – as 5G is higher frequency and ultra-high intensity with shorter millimetre waves which means that many mini cell towers would need to be installed also	Ditto above
A higher tower will bring stronger waves closer to neighbouring residential properties with increased risk of cancer	Dittos above
Government policy is to locate such installations away from local schools. Considered that St Aiden's and Bryon Schools are within 500 metres of the site along with local parks (where children play). Also concern about wildlife in Farthing Downs (and the overall visibility of the mast from this SSSI).	The installation is in excess of 500 metres from neighbouring schools. No consultation was necessary. The relationship with views from Farthing Down would be acceptable
Detrimental impact on trees	There are no trees on the site
Potential noise impact	Noise will not be a factor for local residents with residential property located in excess of 150 metres from the site
The mast would appear obtrusive, in full view from Deepfield Way properties (located on a cliff overlooking the industrial estate). The mast is too high and is not in keeping with the area	The mast would be more visible when viewed from the rear of residential properties but one needs to balance this against the need for enhanced mobile phone coverage and the appearance of the existing installation.
Over-development of the site and increased over-looking	Apart from the increased height and scale of the replacement mast, there is no other clarity or indication as to how the scheme might indicate over-development.

6.3 Councillor Clancy has objected to the scheme, making the following representations:

- Concern over the public health effects of the proposed installation

## **7 RELEVANT PLANNING POLICIES AND GUIDANCE**

7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations. The determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the Consolidated London Plan 2015, the Croydon Local Plan 2018 (CLP) and the South London Waste Plan 2012.

7.2 Government Guidance is contained in the National Planning Policy Framework (NPPF), issued in February 2019. The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Requiring good design.
- Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions

7.3 The main policy considerations raised by the application that the Committee are required to consider are:

### Consolidated London Plan 2015 (LP):

- 4.11 Encouraging a Connected Economy
- 7.4 Local Character
- 7.6 Architecture

### Croydon Local Plan 2018 (CLP 2018):

- SP3.2 Retention and Redevelopment of land in Industrial Use “4 Tier Approach”
- DM10 Design and Character
- DM 17 Views and Landmarks
- DM33 Telecommunications

## **8 MATERIAL PLANNING CONSIDERATIONS**

8.1 The main planning issues raised by the application that the Planning Committee are required to consider are as follows:

- Desire to enhance mobile technology – as a contributor to economic growth;
- Appearance of the replacement installation and the extent of harm caused to existing visual amenities;
- Other residential amenity considerations
- Location and extent to which health concerns should be taken into consideration



## **Visual Amenities**

- 8.4 The Croydon Local Plan (Policy DM33) advises that when proposing a new mast, the applicant is required to demonstrate that there are no existing buildings, masts or other structures on which the apparatus could be sited. It also directs such development (where possible) away from Green Belt and Metropolitan Open Land and seeks to ensure that such installations do not impact on the operation of other electronic devices in the immediate area. Finally, the policy advises that the proposed development should be sited and designed to minimise the impact to the external appearance of the building or structure.
- 8.5 The existing mast installation (which is a lattice mast structure rising to an overall height of 20 metres) has been in place over many years and is suitably located within an industrial estate. The existing structure can be viewed from within the rear gardens of residential properties fronting Deepfield Way and residents have raised concerns over the increased height of the installation and the additional apparatus required (thereby increasing the scale and prominence of the installation).
- 8.6 Whilst it is acknowledged that the mast installation will become more prominent, in view of the appearance of the existing structure and its immediate setting within an industrial estate, considered alongside the need to deliver 5G technology (as highlighted by the NPPF), officers are satisfied on balance, that the harm caused as a consequence of additional height and scale would not be sufficient to sustain a sound reason for refusal. The change in views from Farthing Down would be negligible as a consequence of the proposed installation, with the site being situated within the valley.
- 8.7 It is understood that the mast is being used by more than one mobile network (EE (UK) Ltd and Three (UK) Ltd) and therefore the mast is being suitably shared between mobile phone operators. Whilst policy requires exploration of site sharing of telecommunication masts and other building installations, the replacement of the existing mast represents a suitable solution, especially as the mast is located within an existing industrial area and a reasonable distance away from neighbouring residential areas. Unlike previous resolutions, officers do not see a need to require mast sharing obligations (pursuant to S.106 of the 1990 Act).

## **Residential Amenities**

- 8.8 Local residents have raised issues of over-development, increased overlooking and an increase in noise levels. It is very difficult to understand how these issues apply to this proposed replacement, albeit larger, telecommunications mast.

## **Health Impacts**

- 8.9 The NPPF advises that applications for telecommunications equipment should be supported by necessary evidence, including consultation with local schools or colleges alongside the submission of a self-certification statement to certify the cumulative exposure, to confirm that when operational, the installation would not exceed International Commission guidelines on non-ionising radiation.

- 8.10 There are no schools or colleges close to this site and there was no requirement for the applicant to consult neighbouring schools or colleges. None of the schools highlighted by objectors are within 500 metres of the site (as the crow flies).
- 8.11 The application was accompanied by the required ICNIRP Certificate which satisfies the requirements as laid down by the NPPF. Health considerations and public concern, including perceived fear of health risks can in principle be considerations in determining applications for planning permission. However it is for the decision maker (generally the local planning authority) to determine the weight to be afforded to such considerations in any particular case. In the Government's view, if the development meets the ICNIRP guidelines for public exposure, it should not be necessary for a local planning authority, in processing a planning application, to further consider health aspects and concerns. The applicant, in this case, has confirmed that the proposed installation would comply with the relevant ICNIRP guidelines and a Certificate has been provided to this effect.
- 8.12 Whilst it is clear that residents remain concerned about increased exposure through the introduction of 5G technology, the applicant has satisfied requirements and there is no basis to refuse planning permission on grounds of potential health effects of the proposed installation. Whilst the health effects of such installations is a material consideration, the presence of a valid ICNIRP Certificate satisfactorily deals with the issue.

### **Conclusion**

- 8.13 Taking all of the above planning considerations into account, it is recommended that planning permission should be granted.
- 8.14 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION.