

My wife and I previously submitted an objection to planning application DM/25/1495 on the 27th June 2025. However, new information has come to our attention pertinent to this application by Cellnex. We wish to submit additional new objections to this application:

The stated objective of the development “*is to provide 4G connectivity to passengers using the Brighton Main Line (BML).*”

New objection 1:

Data provided by Cellnex, claims that the section of BML to be covered by the proposed development has “insufficient cover”. However, publicly available information shows that is section of track already has excellent 4G cover (see below for details). This is not disclosed or explained in application DM/25/1495.

New objection 2:

Information disclosed by Cellnex in objecting to a similar nearby mast development DM/24/0880 by a commercial competitor ICON Towers, shows that the reason there is already good 4G signal to this section of track is because Cellnex has an existing transmitter nearby that provides this coverage (see below for details). This information, however, is not disclosed by Cellnex in their current application DM/25/1495.

THIS INFORMATION CALLS INTO QUESTION THE NEED FOR THE PROPOSED DEVELOPMENT (DM/25/1495). THE OBJECTIONS RAISED BY CELLNEX AGAINST THE ICON TOWERS DEVELOPMENT APPLY EQUALLY TO THEIR OWN DEVELOPMENT.

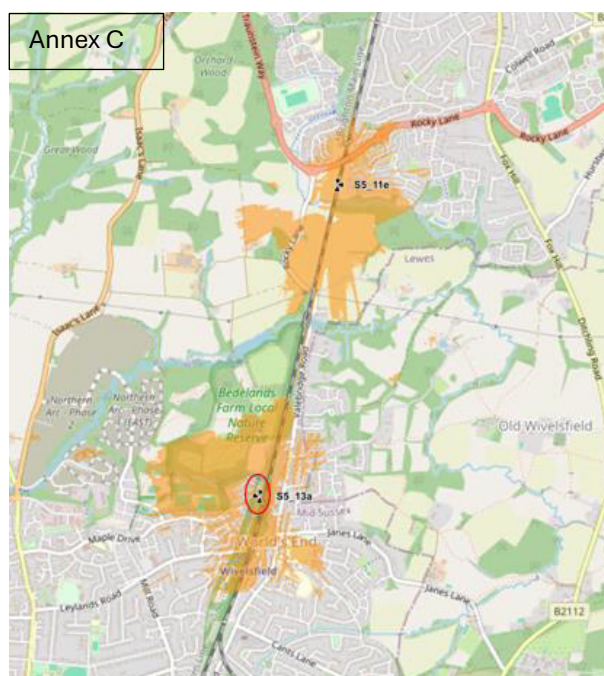
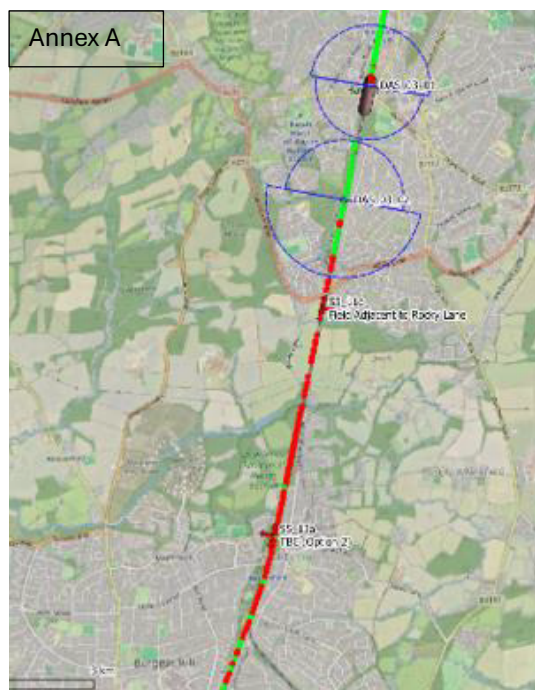
1. This section of the BML already has good 4G cover

Cellnex gives the reason for this development as “*The principal objective of the Brighton Main Line project is to provide seamless fourthgeneration (4G) connectivity to passengers using the railway line.*” To support the need for the mast at the proposed site just off Rocky Lane, their Technical Support Statement shows the currently available network cover in Annex A. The relevant section of this is reproduced on the next page. The green dots denote sufficient existing coverage and the red dots insufficient existing coverage.

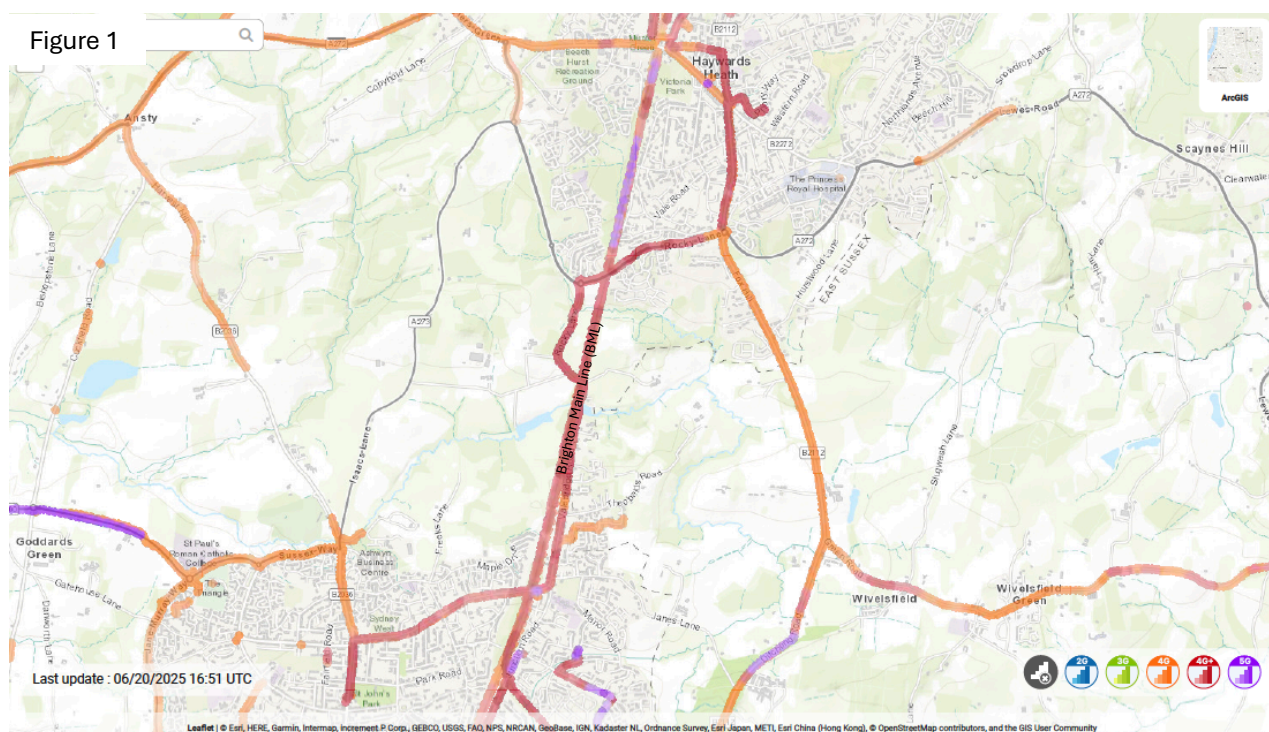
In Annex C (the relevant section of which is shown on next page), Cellnex also shows the extent of the predicted cover that will be provided by the proposed development DM/25/1495 (the upper orange area) and a similar development proposed for Burgess Hill (the lower orange area).

As I mentioned in my earlier objection this clearly shows a gap in the network cover provided between the two proposed developments, which is counter to the stated purpose of the development – to provide “seamless 4G connectivity”. However, I also pointed out that whenever I have travelled this section of track, I have not experienced any connectivity problems, and I am unaware of any other travellers experiencing connectivity problems. I also pointed out that all the major network providers claim to have excellent signal coverage of this area. In view of this I contacted several companies that provide independent verification of network performance for the industry to understand why there is a discrepancy between the data provided by Cellnex and the experience of passengers travelling on the BML and the excellent coverage claims of network providers. Below is the network coverage map provided by one of the open-source independent network performance assessors (Figure 1) for transport routes in the Haywards Heath/Burgess Hill area. This company is called Network

performance (or NPerf at: <https://www.nperf.com/en/>). Other similar organisations provided similar data.



The map shows 4G cover strength in shades of orange, 4G+ in shades of red and 5G in shades of purple. You will note that the entirety of the BML track shown in the Cellnex technical document as having insufficient cover, is shown on this map to have excellent 4G and 4G+ cover. 4G+ (also known as LTE-Advanced or 4.5G) offers faster data speeds than standard 4G. While 4G typically offers speeds up to 100 Mbps, 4G+ can reach speeds of 300 Mbps or higher. **This shows that there is already seamless 4G & 4G+ connectivity for passengers using this stretch of the BML.**



2. Cellnex already operate a 4G transmitter site that provides excellent cover to this stretch of the BML.

In their planning application DM/25/1495, Cellnex claim they considered and discounted 3 other potential sites for the proposed transmission mast. Site 3 that they discounted (Discount 3) was the location of a previous planning application submitted last year for a similar mast by ICON Towers (DM/25/1495). That application was withdrawn following objections raised by Cellnex. See Figure 3 for map showing the locations of these.

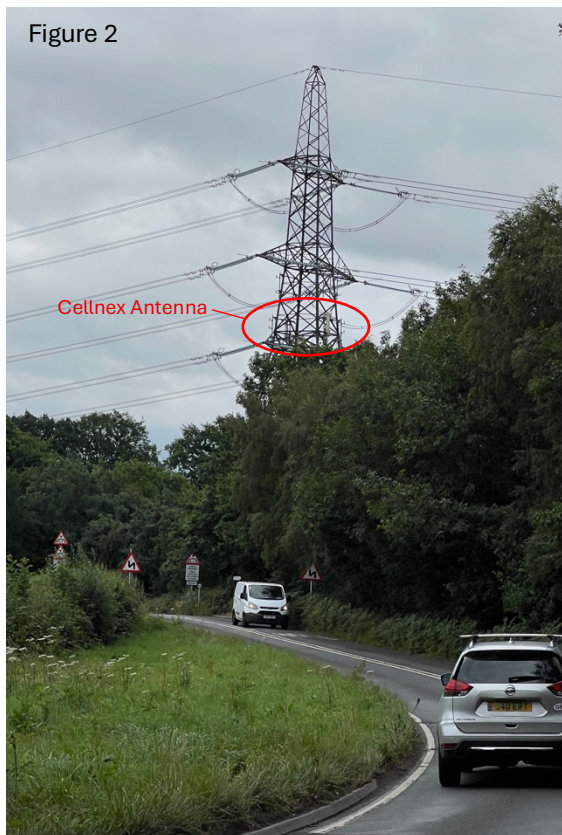
In those objections (see Cellnex's representation letter dated 1st May 2024 in relation to planning application DM/24/0880, and a follow up letter dated 30th May 2024), Cellnex argues against the need to develop separate new transmission masts in the area and criticises the DM/24/0880 planning proposal by ICON Towers Ltd (ITIL):

“ITIL has failed to properly consider the use of National Grid pylons which are abundant in the area and would be ideal to provide coverage for the areas they are aiming to provide for.”

To demonstrate the capability of using National Grid pylons, we highlight that our existing well-established installation located on nearby electricity pylon Ref 4VM121 (and at ground level adjacent to the pylon) provides shared electronics infrastructure used by Vodafone Ltd & VMO2 [Virgin media and O2], in conjunction with Cornerstone”.

“These installations have provided coverage to the surrounding area including the southern section of Haywards Heath for a significant period of time.”

Figure 2



The pylon 4VM12 that they refer to is a 50m tall electricity pylon located at grid reference 532344, 121522 very close to where Rocky Lane passes through the low bridge under the BML (see Figure 2). It is owned and operated by National Grid (NG) and Cellnex have a licence to install and operate telecommunications infrastructure on existing NG electricity pylons like this. Notably, this location is at the center of the strongest 4G/4G+ cover shown on the network cover map above (Figure 1). Confirming that this is the source of signal to this stretch of track, and that this location can provide better and more extensive network cover to the BML than the proposed new development at DM/25/1495. Indeed, unlike the DM25/1495 proposal, this location already provides signal that links the existing signal in Haywards Heath to the existing signal in Burgess Hill providing 'seamless 4G cover to the BML' without the need for any new masts or other structure.

The DM/24/0880 application argued that a new mast was needed because it would house multi-operator equipment that included 5G and other more advanced technologies when available. However, Cellnex responded *“It is inaccurate and misleading to claim that electricity transmission pylons are unsuitable for the installation of improved electronic communications technologies.”* Regarding ITIL's claim that

electricity pylons are not a suitable solution for the deployment of upgraded telecommunications technology, Cellnex stated *“This is a false claim as numerous of Cellnex’s pylon sites are being upgraded across the country.”*

Cellnex also objected to the new mast by pointing out that it would be unnecessary reduplication of infrastructure with an additional adverse visual and environmental impact. To support this, they highlight that the following regulatory and policy framework requires the use of existing pylons instead of the building of new masts:

- Section 10 – Supporting High Quality Communications in the National Policy Framework (particularly paragraphs 119 and 1219C)) set out a sequential approach for the development of new communications infrastructure. This requires the sharing of existing electronic communications sites where available. Where not available, the mounting of antennae etc on other existing structures e.g. electricity pylons should be considered.
- At the local level, Policy DP23 – Communication Infrastructure of the Mid Sussex District Plan 2014-2031 says proposed apparatus and associated structures should minimise impact on the visual amenity, character or appearance of the surrounding area. And preference should be given to using existing rather than new sites.

One has to question why Cellnex therefore failed to declare this important information in application DM/25/1495? Why was their existing pylon 4VM121 site not included among the locations considered for the DM/25/1495 planning application?

Even if the current equipment attached to pylon 4VM121 doesn’t exactly match their plans for the BML project, why can’t it be upgraded to do so? There appears to be absolutely no need for the new mast development proposal DM/25/1495. All the objections Cellnex raised to the DM/24/0880 development apply equally to their own.

However, the location of the DM/25/1495 application adds a whole layer of environmental, visual impact (given its closeness to so many residential properties) and significant health risks – due to its extreme closeness and multi-frequency targeting of the play/exercise area (just 40m) and residences (closest 50m) on the Beeches and Foundry Gardens estates.

The existing 4VM121 pylon site would negate nearly all the objections to the DM/24/0880 and the DM/25/1495 planning applications and would substantially reduce the health risk concerns associated with DM25/1495.

Cellnex’s own words summarizing their objection to the DM/24/0880 proposal apply equally, if not more, to their own DM/25/1495 proposal:

- ***“the development of a ground based mast at the application site is not justified given the failure to properly consider the installation of apparatus on the electricity transmission towers in line with the sequential approach in the NPPF and the Government’s Code of Practice.”***
- ***“the development of the ground based mast will clearly have greater visual impact than the installation of the antennas on one of the electricity transmission towers nearby which is at odds with National Town Planning policies.”***
- ***“Since existing pylons are capable of hosting equipment nearby, the development of a new mast will be an unnecessary structure impacting the environment.”***

- “Therefore, all reasonable steps have not been taken to mitigate the visual impact of the development. We (Cellnex) consider that these factors justify the refusal of prior approval.” – They equally justify refusal of Cellnex’s DM/25/1495 application.

Figure 3

