



Local Planning Authority Appeal Statement

Proposal: Prior approval application for the installation of a 20m Streetworks monopole, 2No.0.3m dishes, and 6No antennae at 16.32m and 19.52m. Additionally, a GPS node will be installed on top of the monopole, along with four cabinets at ground base level and other ancillary equipment.

Location: Drummond Road, Hedge End

Local Authority Reference(s): PN/25/99280

Planning Inspectorate Reference(s): APP/W1715/W/25/3369416

Contents

- 1 Introduction
- 2 Background
- 3 Appeal Site and Surroundings
- 4 Statement of Case
- 5 Planning Balance
- 6 Conclusion

1.0 Introduction

- 1.1 This statement sets out the particulars of the Council's case in respect of planning appeal reference APP/W1715/W/25/3369416 lodged by Dot Surveying Limited on behalf of Mobile Network Broadband Limited Infrastructure Management Services. The appeal is made following the refusal of prior approval on 23rd May 2025.
- 1.2 The Local Planning Authority advises that the previously forwarded Officer Report together with matters of clarification and responses to the Appellant Appeal Statement, as set out herein, form the basis of the Local Planning Authority's Statement.

2.0 Background

- 2.1 The prior approval was refused, under delegated powers, for three reasons, namely;
 1. The proposed telecommunications monopole, by reason of its height, siting, and utilitarian design, would appear as an incongruous and dominant feature within the street scene. It would be significantly taller and bulkier than existing street furniture, visually prominent from nearby public vantage points, and would not be effectively screened or integrated into its surroundings. The proposal would cause demonstrable harm to the open and uncluttered character of Drummond Road, contrary to Policies DM1 and DM9 of the Eastleigh Borough Local Plan 2016–2036, the Quality Places SPD, and the National Planning Policy Framework which require development to respond positively to local character and be sympathetically designed.
 2. The proposed installation, including the monopole and associated cabinets, would result in a narrowing of the shared pedestrian and cycle path on Drummond Road, close to a junction and a well-used community facility. This would create a pinch point, obstruct visibility, and compromise the safe and convenient movement of pedestrians and cyclists. The development is therefore considered to result in unacceptable harm to highway and pedestrian safety, contrary to Policy DM13 of the Eastleigh Borough

Local Plan 2016–2036 and guidance in the National Planning Policy Framework promoting safe and accessible movement within the public realm.

3. The proposed monopole would be prominently sited in front of a community centre which accommodates a nursery facility. While the development complies with public health exposure guidelines, its appearance and perceived health risks are likely to generate fear and anxiety among parents and users. This would discourage attendance, reduce nursery income, and diminish the financial viability of the centre, impacting the income stream of the Town Council. As such, the proposal would have an adverse impact on local economic development, contrary to the economic growth objectives of Policy S4 of the Eastleigh Borough Local Plan 2016–2036 and the National Planning Policy Framework.

3.0 Appeal Site and Surroundings

- 3.1 The site is a part of the public footpath located within a suburban context, immediately to the south of the Community Centre site that serves the residential community, in close proximity to the access to the car park area of the centre, the public playground, and the pre-school and the retail premises 'The Bump Company'. These facilities are accessed from the distributor road that is Drummond Road. To the south on the opposite side of Drummond Road is a line of trees/hedgerow, that provide a verdant character. To the north of Drummond Road, where the proposal is sited, is a shared surface path, with grass verge, with estate railings to the landscaped garden area of the Community Centre. It is an attractive street scene where street furniture is kept to the minimum necessary, and does not dominate the street.

4.0 Statement of Case

- 4.1 In expanding upon the reasons for refusal, the delegated Officer Report identifies, in summary, that the scheme would cause harm through;
 - The monopole's height, bulk, and utilitarian design would appear incongruous and visually harmful to the character of Drummond Road.

- The installation would narrow a shared path near a junction, creating a safety hazard for pedestrians and cyclists.
- Its prominent siting near a nursery would generate fear and reduce attendance, harming the viability of the community centre.

The comments below relate to these matters, and the appellant statement.

Comments Upon the Appellant's Appeal Statement

- 4.2 It is indicated at paragraph 2.3 (Background Information) in relation to the appellant current operating site that, *"The Operators have received notice from the owner to vacate the premises as the site is being decommissioned."* No letter, or copy of any formal communication between the owner and the appellant has been submitted at any stage, so as to understand the reasoning or timeframe behind this, or to explore whether alternative positioning on the same site could have been agreed.
- 4.3 At paragraph 2.4 the appellant has indicated that the current site was chosen following an 'extensive search' of the surrounding area.

The search identified seven sites. The search is considered to be highly limited, and of poor quality. Three of the sites (D2, D3, and D6) were discounted as being within green open space and not therefore being favourable to the community or the local planning authority. One of which was referred to as being overlooked by a children's play area (which the appeal site is). D1, D2, D3, D5 and D7 are discounted due to being overlooked by residential properties. D4 was discounted as being part of an operational recycling centre. D7 (Minchin Acres) was also dismissed as being *"quite far from the search area, so another site may potentially be needed"*, thus suggesting that it was not a realistic option for the appellant in any event.

It is not clear if these are the appellant criteria for reviewing/dismissing sites, why they were selected as sites, to then be discounted. It appears to be a site selection process that selected poor quality sites only rather than comparing realistic opportunities.

There are considered to be many sites between the appellant's existing site and the appellant's narrowly drawn search area and preferred areas, that have not been identified, or considered. For example;

- i. The existing tall mast immediately to the south east of the appellant current operating site (see figure 1),
- ii. In close proximity to D5, but within the commercial area,
- iii. At the large DPD site immediately to the east of the current site;
- iv. The highway verge near to the current site;
- v. A taller mast on the Herald Road site,
- vi. The electricity pylons near to the train station,
- vii. The land/woods/compound immediately to the north of the railway.

It is of particular concern that i) has not been considered/explored or if so, explained why it has been discounted (this is discussed further at 4.6 below).

Despite the many commercial premises in the area only one commercial site, D5 (Southern Calibration Laboratories) was identified, but this was discounted for the sole reason, that, *"there are residential properties within close proximity"*. There is a distance of approximately 20 metres between the identified site and the nearest residential property to the east and no line of sight as identified elsewhere. There is a distance from the Drummond Road appeal site, to the residential properties to the south, at Grange Park of approximately 14 metres.

By the appellant's own criteria, the appeal site should have been discounted, being nearer to residential property than other discounted sites, and in direct view of an area of public open space/a children's play area.

- 4.4 It is also indicated at paragraph 2.4, in discussing a second mast that the appellant has pursued in light of the indicated notice from the owner of the original site, that the appellant's *"understanding is that the mast has been installed and is operational"*. This is of particular concern, as it demonstrates that the appellant has not undertaken a revised site coverage review based upon actual data, and is not aware of the functioning of the existing network.

- 4.5 At paragraph 2.5, it is noted that the one of the requirements for site selection is acquisition. It is noted that the appeal site is within the existing shared surface on land that is part of the highway. The appellant has therefore served notice on Hampshire County Council as the Highway Authority. It is important to note that Hampshire County Council, as the Highway Authority, objected to the planning application on highway safety grounds. It is, therefore, evident that the proposal is not deliverable, in terms of acquisition, as the Highway Authority do not agree that the site is appropriate for development.
- 4.6 It is indicated at paragraph 3.2 of the Appellant statement, that *“Firstly, consideration is given to sharing any existing telecommunications structures in the immediate area.”* It is indicated that these were discounted as there were no masts in the appellant’s own identified search area. It is, however, evident that there are existing masts within the vicinity. Figure 7 of the appellant statement shows (black triangles) other masts in close proximity to the search area, including a tall mast approximately 30 metres to the south east of the current site but 40 metres to the west of the contrived search area (see below figure 1) and a site approximately 230 metres to the south west of the site search area (see figure 2). No coverage maps are provided showing how coverage would be delivered with these masts.



Figure 1 – Image of mast (foreground) not considered for site sharing despite close proximity to search area. Existing mast in background.



Figure 2 – Botley Road Mast (not considered/approached for site sharing) despite close proximity to search area.

- 4.7 At paragraph 3.7 of the Appellant Statement it is stated that, *“it should be noted that some buildings are unsuitable.”* Further generic context is provided for reasons why buildings

could be discounted. It is stated that these factors were considered when considering existing structures. These are generic statements and provide no evidence of buildings in the vicinity having been considered and the reasons for being discounted.

- 4.8 The figures provided at figures 4 to figure 6 of the Appellant Statement are submitted to demonstrate that the proposed mast, the subject of the appeal, together with the Herald Road mast, would meet coverage requirements. That is noted. However, what is distinctly lacking is any such evidence that existing buildings, masts in the vicinity, or other sites in more appropriate locations, could not provide the same coverage, but without causing harm. Paragraph 4.4 states that, “*An alternative site to Drummond Road **may not be able** to close this gap so effectively*”. This is an assumption that demonstrates that due consideration has not been given to alternatives.

This lack of appropriate consideration of alternative sites is contrary to paragraph 120 of the NPPF that states that,

*“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.**”*

And to part 3b of policy DM9 of the Eastleigh Borough Local Plan 2016 – 2036;

“The development of new telecommunications infrastructure will be permitted where:

a. it will enhance broadband speeds and the quality of telecommunications services; and

***b. all possible steps are taken to minimise the environmental impact of the development, and it can be demonstrated that alternative sites and means of provision including mast-sharing have been examined and there are no feasible alternatives to the proposal.**”*

- 4.9 The Appellant (paragraphs 4.6 – 4.10) challenges the Local Planning Authority consideration that alternative sites have not been appropriately assessed, noting that the NPPF identifies that local planning authorities should not question need, but must determine applications based upon planning grounds, and then stating that the council have no knowledge of the requirements of the operator or the existing network.

The appellant has provided two appeals within their appendices, neither of which are directly comparable to the appeal scheme, and for which further details to understand the context are not provided. However, it is noted that, for appeal reference APP/Q3305/W/18/320655 (Whiting Way, Wells, Somerset, BA5 2QF) the Inspector identified as the first main issue ‘the need for the mast’ and found that there was sufficient evidence in that case to demonstrate that this need was for a new mast *“as opposed to making use of any existing mast, building or other structure”*. That is not considered to be evidenced in this case.

For the second appeal, reference APP/U2750/W/24/3342345 (Land at In Moor (Dis) Quarry, In Moor Lane, Middlesmoor, North Yorkshire, HG3 5SU, the Inspector identified that the sole main issue was whether any harm would occur to the character and appearance of the area and *“whether this is outweighed by the need for the installation to be sited in the appeal location as proposed to taking account of any suitable alternatives”*.

The examples provided demonstrate that appropriate site searches and evidence of this are material to the consideration of whether the proposed site is acceptable, so as to balance the harm, against the benefits, including whether there are suitable alternatives.

- 4.10 At paragraph 4.10 the Appellant indicates support for their proposal from “local residents themselves”. One letter of support (although marked as an objection) was received from a customer of the company. This was support for improved reception as opposed to support for the location.
- 4.11 At paragraph 5.2, the Appellant compares the site to *“hundreds of other such street works masts, installed in urban areas all over the country”*. This shows disregard for;

- the importance of place making, and the impact of proposed tall utilitarian infrastructure on the character and appearance of an area;
- the prior approval regime that means the siting of a mast must be considered by a Local Planning Authority; and
- paragraph 120 of the NPPF that states that installations “*should be kept to a minimum*”.

The Appellant Statement implies that masts should be allowed in all locations within settlements. Whilst within the built up area, the character of the area is suburban, and verdant and the proposal would cause a clear planning harm. Whilst views from the south are limited by trees/hedgerow that provide part of the verdant character, it is not agreed that the mast would be ‘visible to a degree’, rather that it would be incongruous and prominent in the street by virtue of its siting (in the footway), height and design and ancillary equipment. The appellant’s justification that, “*there is a variety of existing street furniture including street lighting columns positioned along the grass verges, demonstrating such infrastructure is already an established feature of the area*” does not take account of the height and bulk of the proposed mast. The proposal would dwarf the existing widely spaced lighting columns, being more than twice as tall, wider, and with a collection of equipment at the top, and a group of tall infrastructure cabinets at the street. There is not a variety of existing street furniture in the near vicinity, but sparse, low, discreet lighting columns, and a bin.

- 4.12 It is welcomed that the Appellant appreciates that the proposal will result in visual impact (paragraph 5.7).
- 4.13 At paragraph 5.9 the Appellant identifies that, “*The Officer makes a point in relation to the reduction of pavement width within the decision notice*” and then provides a plan that shows the reduction in width to 1.785 metres with doors open and 2.599 metres with doors closed. It is indicated therein that the location will be at the back of the path to maintain passing clearance for pedestrians and that such installations are designed to be installed on paths. Assurances are offered by the appellant that minimum width requirements will be met, without any reference to any highway standard.

Reducing the footpath from a full width shared surface to a 'minimum' is not considered acceptable for safe and convenient movement for pedestrians and cyclists. Department for Transport Cycle Infrastructure Design Local Transport Note 1/20 (July 2020) establishes the minimum width for shared use routes of 3.0 metres. The Appellant Statement is that the width would be 1.785 metres (with doors open) and 2.599 metres (with doors closed). This is further reduced to the cabinet to the east which sits further forward to 2.5 metres (or 1.25 metres in either direction) (see figure 3).

It is also contrary to the Department for Digital, Culture, Media and Sport guidance for telecommunications operators, 'Code of Practice for Wireless Network Development in England' which at paragraph 32 highlights that,

"Siting on highways and footways: obstructions on footways should be minimised. New, upgraded or replacement sites should be sited so that they do not have an adverse impact upon available footway width to maintain unrestricted pedestrian access. This is particularly important for disabled people, and advice on designing an accessible public realm is given in the Department for Transport's Inclusive Mobility guidance document. Where possible, cabinets should be sited parallel to the carriageway edge in order to minimise any obstruction to pedestrians. Equipment should not obstruct cycle routes, including any shared use routes. The Department for Transport's Manual for Streets and Manual for Streets 2 provide applicable guidance on the siting of street furniture in residential areas and on busy urban and rural streets.

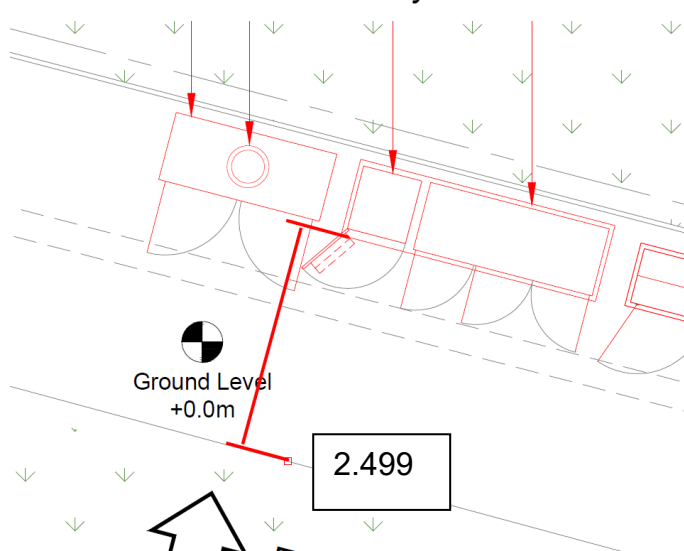


Figure 3 – Reduction of width at narrowest point (with doors closed)

- 4.14 No rebuttal is provided to the fact that the proposed mast and equipment cabinets are within the visibility splays for those leaving the car park as shown below (figures 4 and 5), and would therefore be unsafe. This is particularly the case for a number of reasons;
- given the reduced width from the mast and cabinets;
 - the shared use, which is two directional;
 - the use of the community centre as a nursery attended by young children, and thus parents with pushchairs, and young children learning to cycle; and for the same reasons,
 - the presence of the children's play area.

This is contrary to paragraph 33 of the 'Code of Practice for Wireless Network Development in England' which states that;

"Highway safety: operators must give due consideration to ensure that new, upgraded or replacement sites do not adversely impact upon highway safety or road junctions. They should comply with visibility and line of sight requirements and should not obscure highway nameplates. Operators and highways authorities should work collaboratively in assessing and addressing potential safety issues in order to facilitate network development."

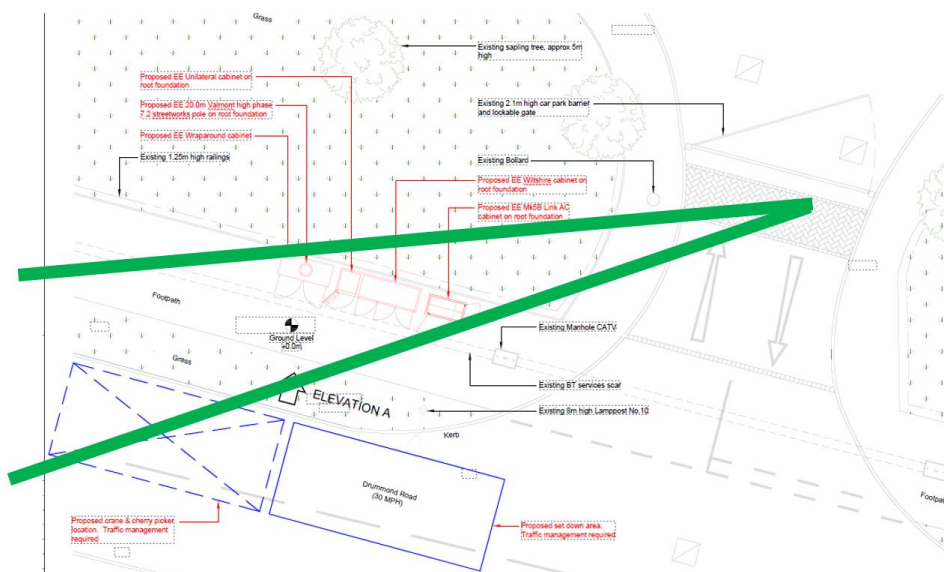


Figure 4 – Visibility Lost on the Approach to the exit through the introduction of equipment cabinets.

5.0 Planning Balance

- 5.1 A Planning Balance was set out within the Officer Report attributing weight to the economic benefits of provision, and the harms associated with the siting of the mast. It was set out that,

“The provision of high-quality, reliable telecommunications infrastructure is strongly supported at both national and local policy levels, recognising its importance for economic growth, social connectivity, and digital inclusion. The proposed development would contribute to improving telecommunications coverage in the area and supports the strategic objectives of Policy S4 of the Eastleigh Borough Local Plan and paragraph 119 of the NPPF.

However, this public benefit must be weighed against the site-specific harms identified. In this instance, the proposed installation would result in unacceptable harm to the character and appearance of the area due to its height, siting, and design; would compromise pedestrian and cyclist safety along a key route; and would have a likely adverse economic impact on a community-run facility due to perceived health concerns. Furthermore, the applicant has failed to robustly demonstrate that alternative, less harmful sites have been adequately explored.

On balance, it is considered that the identified harms significantly and demonstrably outweigh the benefits of improved telecommunications infrastructure in this location. Accordingly, prior approval is refused.”

- 5.2 Nothing within the Appellant’s Statement has altered the Local Planning Authority view in respect of this balance/conclusion.

6.0 Conclusion

- 6.1 For the reasons outlined in this Statement, the Local Planning Authority maintains that the siting and appearance of the proposed telecommunications monopole and associated infrastructure would result in significant visual harm to the character and appearance of Drummond Road, compromise pedestrian and cyclist safety, and adversely affect the operation and viability of a valued community facility.

- 6.2 The Appellant has not provided robust or credible evidence to demonstrate that less harmful, suitable alternatives have been fully explored or ruled out. The site selection process appears limited and flawed, and the assumptions about coverage and deliverability are not adequately substantiated.
- 6.3 While the benefits of enhanced telecommunications infrastructure are acknowledged, these do not outweigh the clearly identified site-specific harms in this case. National and local policy support for digital connectivity does not override the need for careful siting that respects local context, public safety, and community wellbeing.
- 6.4 The Council therefore respectfully requests that the appeal be dismissed.