

Hedge End Town Council – evidence to Planning Inspectorate Appeal concerning:

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

Date of Submission: 22 August 2025

CONTENTS

Section	Title	Page
1	Introduction	1
2	Existing Site Replacement	2
3	The Drummond Centre	3
4	Contravention of the National Planning Policy Framework (“NPPF”)	4
5	Contravention of Code of Practice for Wireless Network Development in England	5
6	Conclusion	6
Appendices		

I. Introduction

This statement is submitted for and on behalf of Hedge End Town Council as a stakeholder and immediately neighbouring owner of property adjacent to the Appeal Site, which is land at Drummond Road, Hedge End. The applicants and appellants in this appeal are Mobile Broadband Network Limited, EE Ltd and H3G UK Ltd, together referred to as the Applicant or the Appellant.

The original planning application number, as recorded by Eastleigh Borough Council is PN/25/99280, referred to in this statement as “the Application”.

Hedge End Town Council, referred to in this statement as “the Town Council”, is the first tier of local government in Hedge End and is, therefore, closest to the community. It is the freehold owner of the Drummond Centre, which is immediately adjacent to the pavement and highways land on which the Appeal Site is proposed.

The Appeal concerns the 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 on land adjacent to the Drummond Centre, Drummond Road, Hedge End, SO30 2AD (“the Appeal Site”).

The Town Council is responding to this Appeal as a landowner/stakeholder rather than a statutory consultee. It should be highlighted the Application was considered by the Town Council’s Highways and Planning Committee at its meeting on 7th May 2025. At that meeting the following resolution was minuted: ***RESOLVED We strongly object to the proposed development on the grounds that it is not in keeping with the character of the surrounding streetscene and would have a significant adverse visual impact on the area. The Committee is particularly concerned about the proposal’s close proximity to a nursery, residential properties, and its potential implications for pedestrian safety. Furthermore, the site’s location in relation to the nearby airport raises additional concerns. The Committee believes that more appropriate alternative sites should be considered and notes a lack of sufficient justification provided for the selection of this specific location.***

Please address any questions arising from this statement to the Clerk of the Town Council by email at townclerk@hedgeend-tc.gov.uk.

2. Existing site replacement and site selection

The Application refers to the need to replace the Existing Site at Southampton ASC, Hamilton Business Park, Botley Road, Hedge End, SO30 2JH which is planned for removal due to a notice to quit (NTQ) having been served on the operator to vacate that site. It is understood the Existing Site comprises a large (30m+) radio tower. There is a second, similar height tower next to it, understood to be shared by different networks to the Applicant. Photos of these two sites are included in the Appendices. We are not aware of any details having been provided to the Town Council on the timescale for the removal of the Existing Site.

It is assumed that the second tower close to the Existing Site is also due to be removed, otherwise it would make sense to move the Appellant's network apparatus from the Existing Site on that, second tower. However, very little is said about the loss of the Existing Site in the Application and the Appellant's statement of case. The statement of case simply states "*The proposed telecommunications installation is required to replace a nearby site, which is due to be removed, the site owner having served a notice to quit on the Appellant.*" In its conclusion it also refers to a pending "hole" in radio coverage.

Other than these references, there is no other detail on the loss of the Existing Site. No reference is made to the reason for the NTQ or the options to replace the Existing Site with one in the same immediate vicinity. With the loss of two large radio towers it would seem reasonable for the operators to fully consult with the LPA and the developer of the Existing Site to consider options to amalgamate their replacement coverage requirements into a single, shared site, possibly on the margins of the land, which is presumably being developed, resulting in the loss of the existing site.

There is a lack of evidence and information on any other existing structures or buildings being properly considered as a replacement to the Existing Site. This includes joint approaches with other operators at risk of losing coverage to locate on a shared or existing structure or building. We have reviewed the Planning Authority's Appeal Statement and considered the comments in that relating to site selection. Aside from the above, we have nothing further to add to that statement on the dismissal of alternative options to the Appeal Site.

3. The Drummond Centre

The Appeal Site is designated highways land, located immediately outside the curtilage of the Drummond Community Centre in Hedge End. The Drummond Centre is owned by the Town Council and is available for hire by the general public for private events and parties. It is also used as a pre-school, branded as Little Drummers Pre-School. The pre-school manager describes it as a non-profit charity pre-school, run by a committee made up of past and existing parents¹. They have offered high quality childcare and support for the children and families of Hedge End from the Drummond Community Centre for over 30 years. Little Drummers operates from 0900 to 1530 Monday to Friday and hosts children from 2 years of age to 4 years of age.

Importantly, for the purposes of this Appeal, Little Drummers Pre-School is a school for the purposes of consultation in wireless network development and planning policy set out within the NPPF. It has not been properly consulted in the selection and proposed development of the Appeal Site.

Little Drummers pre-school effectively rents the Drummond Centre from the Town Council, at a rate equating to approximately £28000 per year. Earlier this year the grounds of the Drummond Centre were proposed by the Appellant as the possible location for a temporary 5G mast site. A drawing of that temporary proposal is included in the appendices to this statement. The Town Council was extremely concerned at the approach from the Operator for such a site to be proposed for installation on its land.

The Town Council was approached by the Appellant with a request to enter into a temporary licence to host the temporary site. The request included a veiled threat that if terms for a licence couldn't be agreed the appellant would refer the matter to the Uppers [sic] Tribunal of the Lands Chamber and reserve the right to seek recovery of costs in such an eventuality. This is a heavy handed approach, showing a lack of proper consultation with the local community and stakeholders.

Little Drummers Pre-school wrote to the Chair of the Town Council on 10 June 2025 in objection to that proposal stating *"we cannot over emphasise the negative impact this proposed mast and compound could have on our pre-school business if it is allowed to be built."*

The Appellant was subsequently informed of the likely loss of income by the Drummond Centre if the pre-school was to leave the premises. The temporary site application has since been withdrawn. The potential compensation arising from the loss of income by the Town Council was probably one of the factors in the decision to withdraw that application. However, the Town Council as the potential Site Provider is concerned that the application may be resurrected if a suitable coverage solution cannot be implemented by the Appellant before the Existing Site is switched off. Notwithstanding this, the unsuitability of the temporary site location and its likely impact on the pre-school should not be a reason to justify a slightly less intrusive monopole mast on the pavement outside the Drummond Centre.

This approach and the fact that a design drawing was put together before the Town Council as a landowner/Site Provider was properly consulted about existing and alternative uses for the land under the temporary mast site shows an inadequate regard for the consultation process and proper consideration of site selection.

¹ Letter from Little Drummers Pre-school to Cllr Ron Nicholls 10/06/2025

4. Contravention of the National Planning Policy Framework (“NPPF”)

The NPPF refers to supporting high quality communications infrastructure at Paragraphs 119 to 123². At paragraph 122 it states applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development, including the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college [author’s emphasis]

The Pre-school was apparently consulted about the subject application but the Appellant states they did not respond to that. No details of the consultation are immediately obvious in the Application or the Appellant’s statement of case. On the list of consultees in the Application “Little Drummers” is not listed. The claim in the Applicant’s supporting statement to have formerly consulted with the pre-school must therefore be questioned. However, it is possible the Pre-school, if it was formally notified of the application, has not properly distinguished between the proposed temporary site application and the subject Application. It wrote a strongly worded letter to the Chair of the Town Council objecting to the proposed temporary site. It may have considered that objection would also apply to the subject Application or it may have waited for a second consultation or notification to be provided to it relating to the subject Application, which never arrived.

The Local Council was consulted as the recipient of the Application. As part of that it notified the Town Council as a statutory consultee to the prior approval application. The Town Council considered the application at its highways and planning committee meeting. However this is a completely separate process to the Applicant’s requirement to notify the Town Council as the neighbouring landowner and community stakeholder and separate to a proper consultation with the pre-school as the Town Council’s “tenant” and occupier of the neighbouring land.

Given the interest that the Appellant had in the Appeal Site and the Drummond Centre, we would have expected a much more formal consultation to have been held with the Town Council and Little Drummers Pre-school in accordance with the NPPF. There is a lack of evidence of any such consultation in the Application which is a clear contravention of policy as set out in the NPPF.

² <https://www.gov.uk/guidance/national-planning-policy-framework/10-supporting-high-quality-communications-infrastructure>

5. Contravention of Code of Practice for Wireless Network Development in England

The site selection and consultation process is in contravention of the Code of Practice for Wireless Network Development in England³ (referred to as “the Code of Practice”). That states at Paragraph 25 *“Installation on existing buildings/structures: where possible, operators should look to use existing buildings/structures for hosting wireless infrastructure, to reduce the environmental impact of installation.”*

The Appeal Site is not an existing building or structure. There is a lack of evidence and information on any other existing structures or buildings being properly considered as a replacement to the Existing Site. This includes joint approaches with other operators at risk of losing coverage to locate on a shared or existing structure or building.

Paragraphs 85 to 88 of the Code of Practice refer to Consultation with schools. Paragraph 85 states *“Where it is proposed to install, alter or replace a base station in the vicinity of a school⁴ or college, operators should discuss the proposed development with the relevant body of the school or college before submitting an application to the local planning authority.”*

It goes on that operators should consult with the planning authority which schools and colleges should be consulted on a case by case basis and consider whether the site is on school or college grounds or on a main access point used by pupils or students at the school/college. At a minimum the operator should send a consultation letter or email to the school or college and that should be saved or referenced within any subsequent application. The outcome of such consultations should be included in the subsequent planning application. No such evidence of this consultation has been provided in the Application.

³ <https://www.gov.uk/government/publications/code-of-practice-for-wireless-network-development-in-england>

⁴ Code of Practice Footnote 44 states “A school is an institution providing education for children within the nursery (2-5), primary (5-11), and secondary (11-16) education ranges. A college of further education is an institution providing full or part-time education for students over the age of 16. This includes sixth form colleges (16-19).”

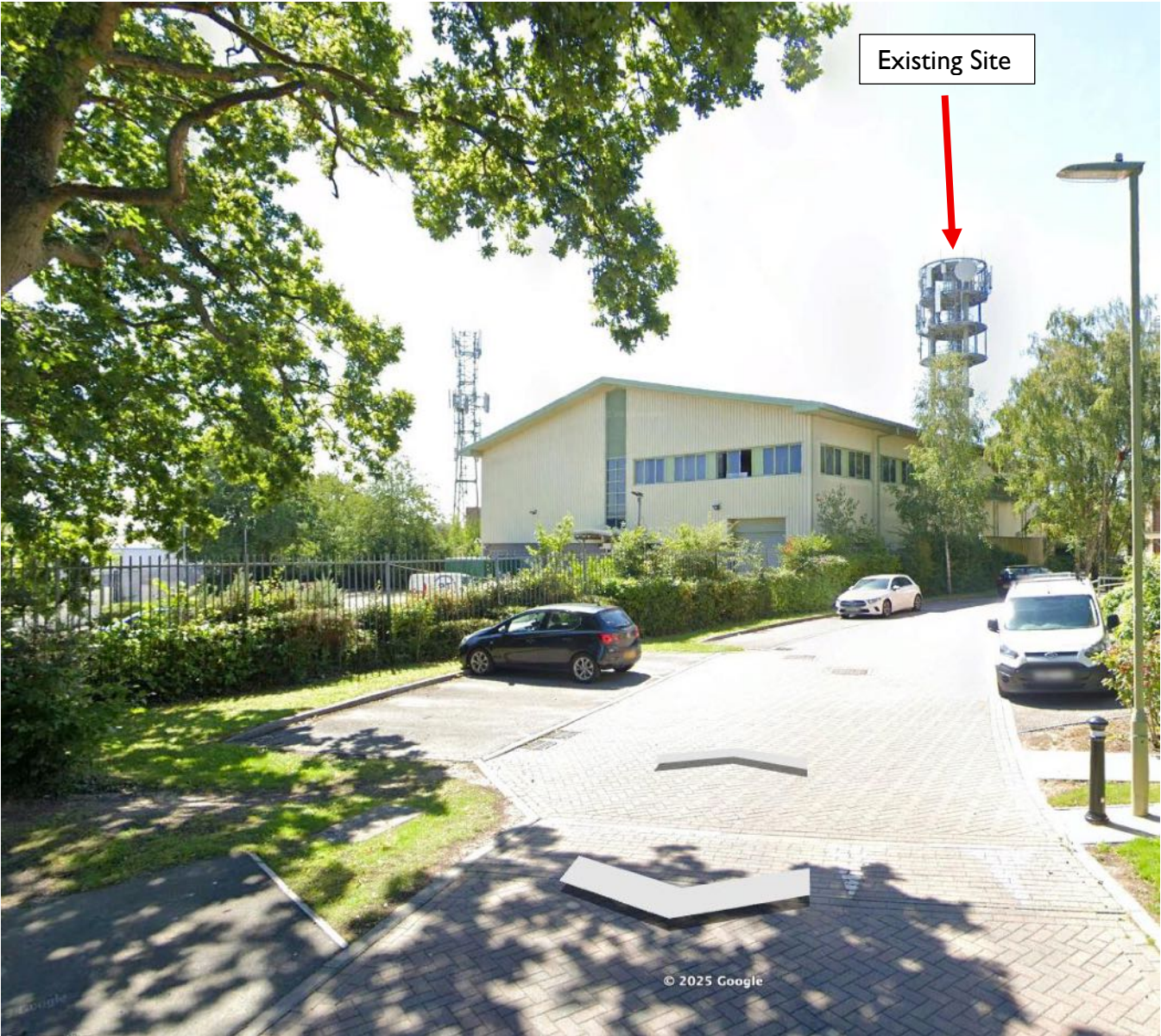
6. Conclusion

For the following reasons, the Town Council respectfully requests that the appeal be dismissed:

- i). There is a lack of information on the requirement for the site. Very little information has been provided on the anticipated loss of the Existing Site including the timescale for that and the legal and commercial reasons behind the notice to quit the Existing Site;
- ii). No explanation has been provided on the existing tower close to the Existing Site and whether that is also at risk of removal. If so, more consultation should be held with the Planning Authority on how best to replace the coverage lost by a significant development that warrants the removal of two large radio towers;
- iii). There is a lack of evidence that a correct site selection and option dismissal procedure has been followed in line with local and national policy and the Code of Practice for Wireless Network Development;
- iv). The Appellant has not undertaken proper consultation or has inadequately consulted with local stakeholders and schools/colleges when selecting the Appeal Site as its chosen location. This is in contravention of national planning policy set out in the NPPF. It is also in contravention of the consultation requirements in the Code of Practice in Wireless Network Development in England;

APPENDICES

Existing Site Photos © Google Earth



Existing site (red arrow) taken from Hansen Gardens



Existing site (red arrow) taken from Manaton Way

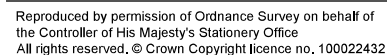
Drawings of proposed temporary site at the Drummond Centre



SITE AREA PLAN



0 1.50 000 1km 2



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

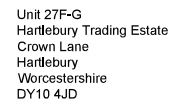
Demise: 

Access Route To Site: 

Access Route: 

MBNL Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LN

Design Consultant & Principal Contractor:



Site Name: **DRUMMOND COMMUNITY
CENTRE TEMP**

Site ID: 30001366

Address:

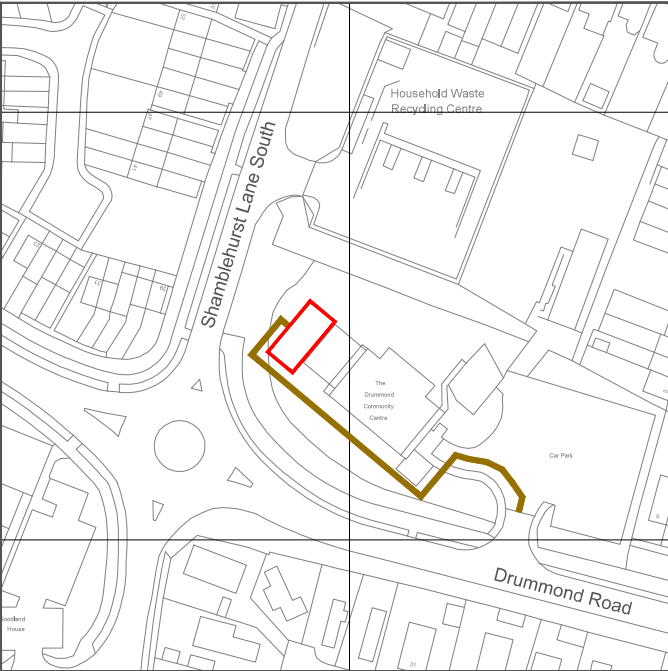
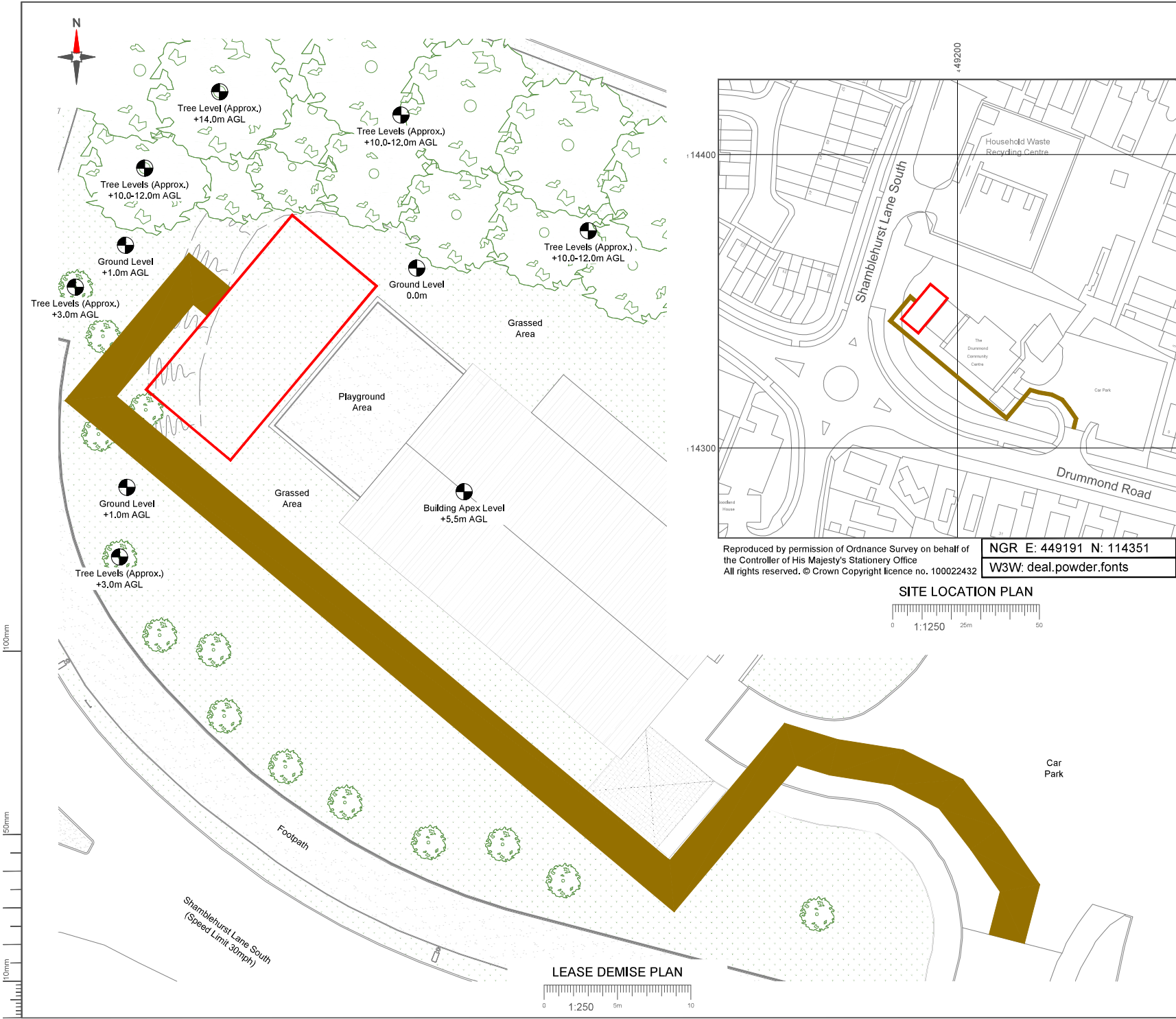
DRUMMOND COMMUNITY CENTRE
DRUMMOND ROAD
EASTLEIGH
SO30 2AD

Title: **002 SITE LOCATION PLAN**

Project: NTQ

Purpose of Issue:	GENERAL ARRANGEMENT
-------------------	---------------------

File name:	30001366 ELH089 33499 TBA M001
------------	--------------------------------



NEW CODE:	
Equipment Demise:	Outlined in Red 
Access Route:	Solid Brown 

Master:	Project:	Purpose of Issue:	Issue:
M001	NTQ	Planning	A
Date:	15/01/2025	Revision / Upgrade Description:	First Issue
Drawn:	F. Lippia	Checked:	C. Borge
Approved:	M. Naid		
 Hutchinson 3G UK Limited Green Park, 402 Longspur Avenue Reading, RG20 2UR Tel: 0118 752 1000 Fax: 0118 752 1001 H3G Base Station Information Line: 0845 0641000 Available Monday to Friday			
 Everything Everywhere One River Street London E1 6SE Tel: 020 7396 1000			

MBNL	Mobile Broadband Network Limited Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX
-------------	---

Design Consultant & Principal Contractor:	 Unit 27F-G Hartlebury Trading Estate Crown Lane Hartlebury Worcestershire DY10 4JD
---	--

Site Name:	DRUMMOND COMMUNITY CENTRE TEMP		
Site ID:	30001366		
Address:	DRUMMOND COMMUNITY CENTRE DRUMMOND ROAD EASTLEIGH SO30 2AD		
Title:	004 LEASE DEMISE		
Project:	NTQ		
Purpose of Issue:	GENERAL ARRANGEMENT		
EE Cell ID	MBNL Cell ID	H3G Cell ID	
33499	ELH089	TBA	
File name:	30001366_ELH089_33499_TBA_M001		



Sharnbush Lane South
(Speed Limit 30mph)

Kerb

Tree Level (Approx.)
+3.0m AGL

Tree Level (Approx.)
+3.0m AGL

Tree Level (Approx.)
+3.0m AGL

Tree Level (Approx.)
+3.0m AGL

Ground Level
+1.0m AGL

Tree Level (Approx.)
+3.0m AGL

Grassed Area

Tree Levels (Approx.)
+10.0-12.0m AGL

Ground Level
+1.0m AGL

Tree Levels (Approx.)
+10.0-12.0m AGL

Ground Level
0.0m

Tree Levels (Approx.)
+10.0-12.0m AGL

Grassed Area

Playground Area

Existing 1.1m high railing

Building Apex Level
+5.5m AGL

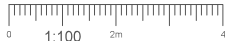
Existing 1.2m high railing
Existing BT service cover
Existing 9.0m high streetlight

Existing street sign

Footpath

ELEVATION A

EXISTING SITE PLAN



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Master:	Project:	Purpose of Issue:	Issue:
MO01	NTQ	Planning	A
Date:	Revision / Upgrade Description:		
15/01/2025	First Issue		
Drawn:	F. Lippitt		
Checked:	C. Barge		
Approved:	M. Naud		

Hutchison 3G UK Limited
Green Park, 402 Longwalk Avenue
Reading, RG20 2JR
Tel: 0118 752 1000
Fax: 0118 752 1001
H3G Base Station Information Line
0845 6042000
Available Monday to Friday

Everything Everywhere
One Broad Street
London
E1 6SE
Tel: 020 7396 0000

Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

Unit 27F-G
Hartlebury Trading Estate
Crown Lane
Hartlebury
Worcestershire
DY10 4JD

Site Name: DRUMMOND COMMUNITY CENTRE TEMP

Site ID: 30001366

Address: DRUMMOND COMMUNITY CENTRE
DRUMMOND ROAD
EASTLEIGH
SO30 2AD

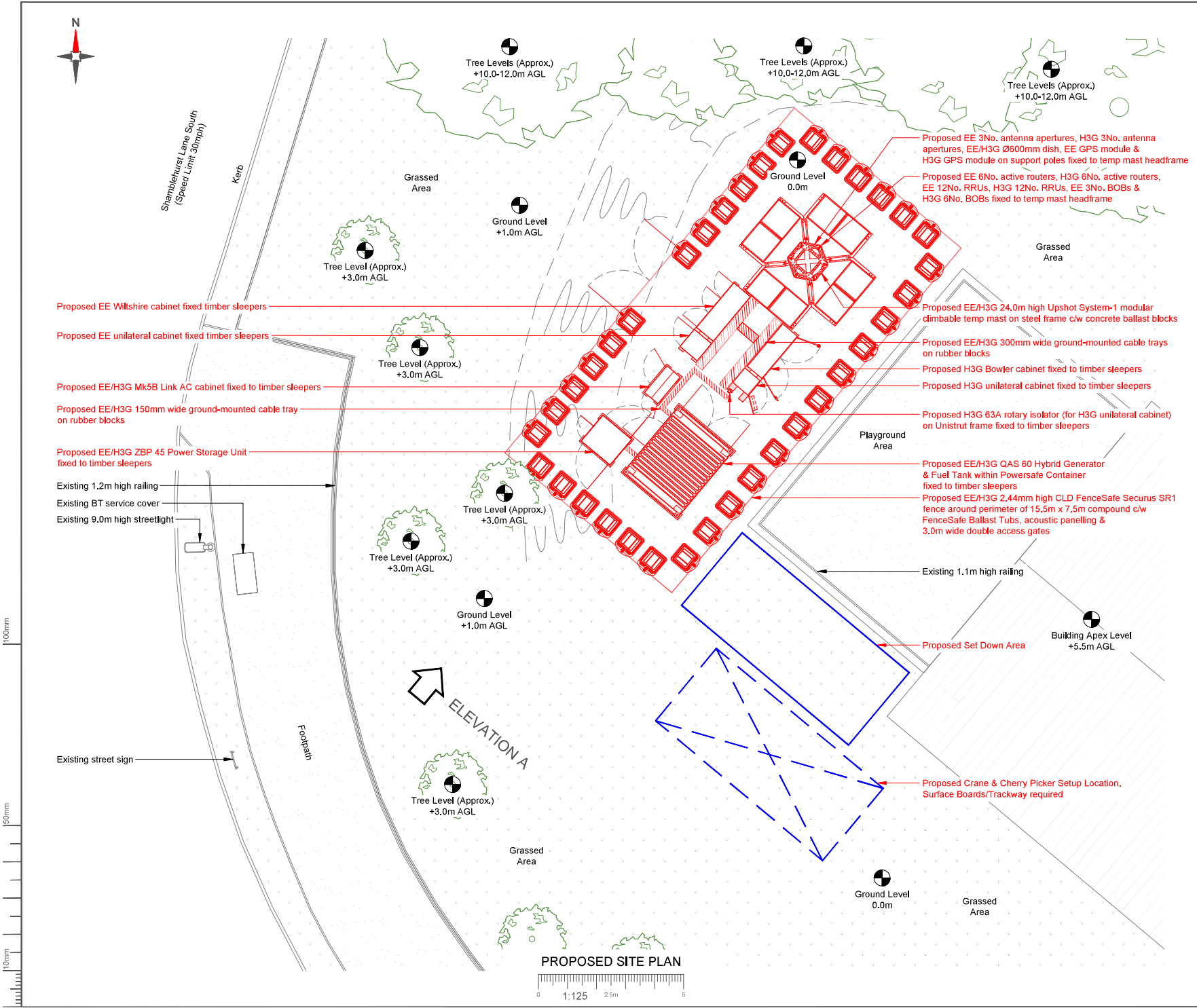
Title: 100 EXISTING SITE PLAN

Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	H3G Cell ID:
33499	ELH089	TBA

File name: 30001366_ELH089_33499_TBA_M001



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Master:	Project:	Purpose of Issue:	Issue:
M001	NTQ	Planning	A
Date:	15/01/2025	Revision / Upgrade Description:	First Issue
Drawn:	F. Lippia	Checked:	C. Borge
Approved:	M. Naud		

Hutchison 3G UK Limited
Green Park, 402 Longwalk Avenue
Reading, RG20 2UR
Tel: 0118 752 1000
Fax: 0118 752 1001
H3G Base Station Information Line:
0845 6041000
Available Monday to Friday

Everything Everywhere
One Better Street
London
E1 6BE
Tel: 020 7396 1000

Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

Unit 27F-G
Hartlebury Trading Estate
Crown Lane
Hartlebury
Worcestershire
DY10 4JD

Site Name: DRUMMOND COMMUNITY CENTRE TEMP

Site ID: 30001366

Address: DRUMMOND COMMUNITY CENTRE
DRUMMOND ROAD
EASTLEIGH
SO30 2AD

Title: 150 PROPOSED SITE PLAN

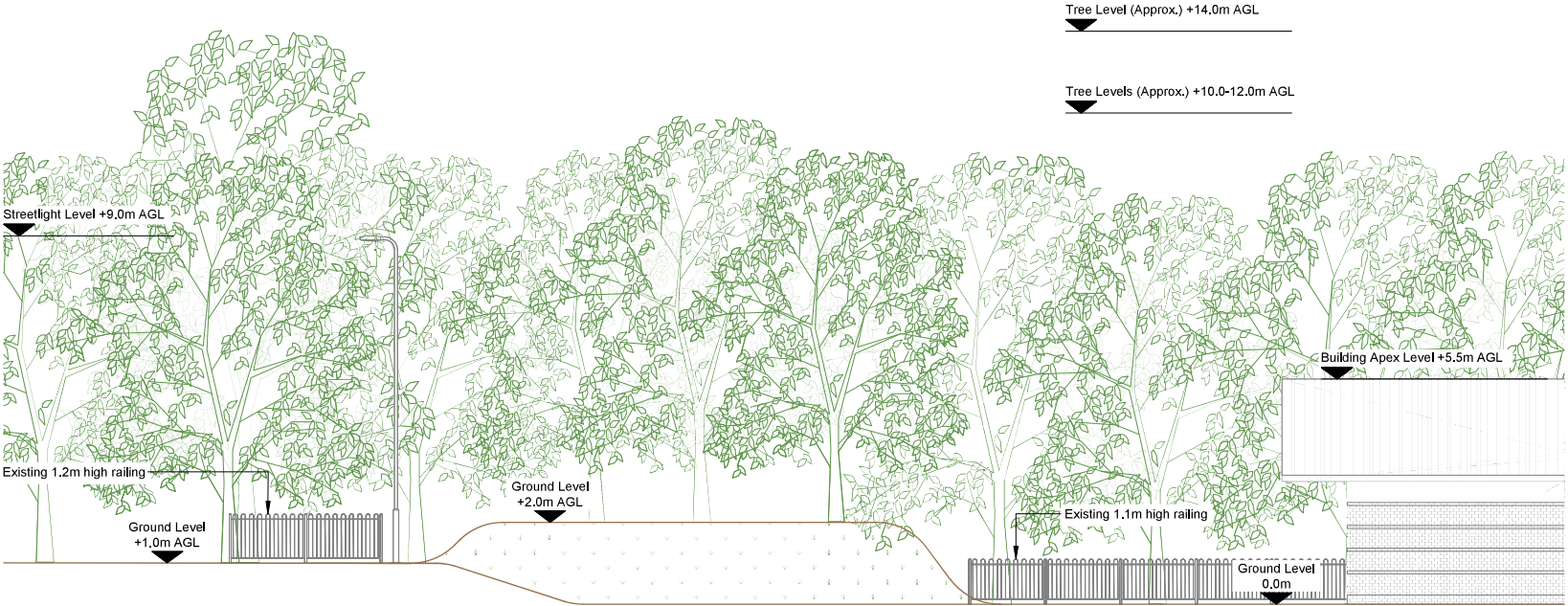
Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	H3G Cell ID:
33499	ELH089	TBA

File name: 30001366_ELH089_33499_TBA_M001

100mm
150mm
100mm



EXISTING SITE ELEVATION A



NOTES:
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Master:	Project:	Purpose of Issue:	Issue:
M001	NTQ	Planning	A
Date:	15/01/2025	Revision / Upgrade Description:	
Drawn:	F. Lippiaff	First Issue	
Checked:	C. Bange		
Approved:	M. Naud		



Hutchinson 3G UK Limited
Green Park, 402 Longspur Avenue
Reading, RG20 2UR
Tel: 0118 200 1000
Fax: 0118 200 1001
H3G Base Station Information Line
0840 6041000
A to B 888, 9am to 5pm Monday to Friday



Everything Everywhere
One Brier Street
London
E1 6EE
Tel: 020 7396 5000



Mobile Broadband Network Limited
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:



Unit 27F-G
Hartlebury Trading Estate
Crown Lane
Hartlebury
Worcestershire
DY10 4JD

Site Name: DRUMMOND COMMUNITY CENTRE TEMP

Site ID: 30001366

Address:
DRUMMOND COMMUNITY CENTRE
DRUMMOND ROAD
EASTLEIGH
SO30 2AD

Title: 200 EXISTING SITE ELEVATION

Project: NTQ

Purpose of Issue: GENERAL ARRANGEMENT

EE Cell ID:	MBNL Cell ID:	H3G Cell ID:
33499	ELH089	TBA

File name: 30001366_ELH089_33499_TBA_M001



NOTES: 1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.			
Master: M001 Project: NTQ Purpose of Issue: Planning Issue: A			
Date: 15/01/2025 Revision / Upgrade Description: First Issue			
Drawn: F. Uppitt Checked: C. Bunge Approved: M. Nott			
 Hutchison 3G UK Limited Green Park, 400 Longwalk Avenue Reading RG2 2JR T44 01235 700 000 Fax: 01235 700 001 H3G Base Station Information line: 0844 800200 available 24 hours Monday to Friday		 Everything Everywhere One Bishop Street London E1 6BE T44 020 7306 1000	
 Mobile Broadband Network Limited Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX			
Design Consultant & Principal Contractor:			
		Unit 27F-G Hartlebury Trading Estate Crown Lane Hartlebury Worcestershire DY10 4JD	
Site Name: DRUMMOND COMMUNITY CENTRE TEMP			
Site ID: 30001366			
Address: DRUMMOND COMMUNITY CENTRE DRUMMOND ROAD EASTLEIGH SO30 2AD			
Title: 250 PROPOSED SITE ELEVATION			
Project: NTQ			
Purpose of Issue: GENERAL ARRANGEMENT			
EE Cell ID: 33499	MBNL Cell ID: ELH089	H3G Cell ID: TBA	
File name: 30001366_ELH089_33499_TBA_M001			