

From: [REDACTED]
Sent: 17 September 2026 22:39
To: Planning
Cc: [REDACTED]
Subject: DC/26/1387 - Formal Objection – Proposed 13m Telecommunications Pole and Equipment Cabinet, Corner of Haglands Lane / Nightingales, West Chilmington

Categories: Comments Received



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Subject: DC/26/1387 - Formal Objection – Proposed 13m Telecommunications Pole and Equipment Cabinet, Corner of Haglands Lane / Nightingales, West Chilmington

Dear Planning Officer,

I am writing to object formally to the proposed telecommunications installation at the corner of Haglands Lane and Nightingales, West Chilmington.

The proposal comprises a **13-metre-high steel pole with whip antenna, modem and associated cabling, together with a ground-mounted equipment cabinet.**

I understand that the installation is being proposed by SUEZ in connection with Southern Water's smart water metering programme and that the application is being dealt with under the telecommunications permitted development provisions, with prior approval being sought in relation to siting and appearance.

I have no objection in principle to Southern Water improving communications for its smart metering network. However, the fact that there is a legitimate need for communications infrastructure does not, in itself, mean that this particular location is suitable for a structure of this size.

Having considered the submitted information, I have concerns about the proposed siting and appearance, the effect on the character of Haglands Lane, residential amenity, biodiversity, pedestrian and highway safety, and, importantly, whether the applicant has provided sufficient evidence to show why this particular site has been chosen.

I would therefore ask the Council to consider the following matters carefully before reaching a decision.

1. Scale and nature of the proposed structure

The submitted elevation drawing makes the scale of the proposal particularly apparent.

The pole is shown as being **13 metres above ground level**, with the antenna reaching approximately the same height. This is therefore not simply a small piece of roadside equipment. It would be a substantial new vertical structure in the local landscape.

The proposal also includes an equipment cabinet measuring approximately **660mm wide x 305mm deep x 1,130mm high**, together with cabling and a steel cable cover running up the pole.

Taken together, the development would introduce:

- a 13-metre steel pole;
- a whip antenna;
- a modem;
- associated cabling;
- a sizeable ground-mounted equipment cabinet;
- foundations; and
- underground services.

These elements should be considered as one development rather than as separate pieces of equipment.

The pole would extend well above the existing hedge and surrounding low-rise development and would consequently be visible from the road and nearby properties.

2. The existing hedge will not effectively screen the mast

The North Elevation submitted with the application illustrates this quite clearly.

The hedge would hide some of the lower part of the installation and would provide some screening of the cabinet. It would not, however, screen the principal visual element of the proposal: the 13-metre pole and antenna.

A substantial proportion of the structure would remain visible above the hedge. It would consequently appear as a new, engineered vertical feature within what is currently a predominantly green and relatively low-rise setting.

The Government's Code of Practice for wireless network development advises that new masts should, where practicable, be positioned so as to minimise their effect on their surroundings, including landscape and buildings. It also encourages the use of existing vertical infrastructure where appropriate.

The Council should therefore consider the actual visual relationship between the proposed structure and its surroundings rather than assuming that the existing hedge provides sufficient mitigation.

3. There is insufficient evidence that this is the appropriate site

This is one of my main concerns.

SUEZ's supporting letter states:

“While most radio devices will be hosted on existing telecoms infrastructure...”

The letter then explains that terrain limitations have resulted in poor reception and that the SUEZ network design team has identified a “suitable location” for a new streetworks site.

The difficulty is that the information provided does not adequately explain **why this particular location has been selected**.

In particular, I have not seen sufficient information setting out:

- the geographical area searched;
- the alternative sites considered;
- existing telecommunications structures that were investigated;
- utility poles or other existing vertical structures considered;
- buildings or building-mounted solutions considered;
- other roadside locations considered;
- alternative positions in the immediate vicinity;
- the technical reasons why those alternatives were discounted;
- why this particular grassed roadside corner is required; or
- why a structure as high as 13 metres is necessary.

This is particularly relevant because Horsham District Council's validation requirements for telecommunications development refer to matters including the area of search, alternative sites considered, the proposed structure, technical justification and the reasons for rejecting other sites.

Simply describing the proposed location as “suitable” does not, in my view, demonstrate that it is the most appropriate location or that less harmful alternatives have been properly investigated.

I therefore ask the Council to seek further evidence from the applicant explaining the site-selection process and demonstrating why this location is necessary.

4. Existing telecommunications infrastructure should be properly considered

The applicant's statement that most radio devices will be accommodated on existing telecommunications infrastructure is significant.

It raises the obvious question of why existing infrastructure cannot also be used to address the particular coverage problem in this area.

I am not suggesting that an alternative structure necessarily exists. The point is that the applicant should demonstrate that it has genuinely looked for one.

The National Planning Policy Framework encourages the use of existing masts, buildings and other structures for new electronic communications capability.

The Government's Code of Practice also advises that new masts should, where practicable, be sited so as to minimise their impact on their surroundings.

Before accepting that a new 13-metre pole is necessary on this particular grassed verge, the Council should therefore be satisfied that existing structures and other reasonable alternatives have been properly investigated.

5. “Terrain limitations” do not explain why this site and this height are necessary

I accept that terrain may create difficulties for radio coverage. That may explain why additional infrastructure is required somewhere in the area.

It does not, however, explain why a **13-metre structure at this precise location** is the appropriate solution.

The applicant should provide sufficient technical information to establish:

1. where the existing coverage deficiency occurs;
2. the area requiring additional coverage;
3. the relevant radio-planning requirements;
4. the antenna height required;
5. why 13 metres is necessary;
6. what coverage would be achieved from this location;
7. what other locations were investigated; and
8. why those alternatives were rejected.

Without this information, the Council is effectively being asked to accept the applicant's conclusion that the site is suitable without being given enough evidence to understand how that conclusion was reached.

6. Highway and vehicle safety

I have particular concerns about the proposed position at the corner of **Haglands Lane and Nightingales**.

This is not simply an unused piece of grass. It forms part of the existing roadside environment and is immediately next to the pedestrian route.

It is also used by **delivery vehicles as a turning area for lorries**.

Of particular relevance is the fact that there have previously been incidents in which a delivery lorry has mounted the grass verge at this location and **knocked down a signpost**.

That history is important when considering the introduction of a permanent 13-metre structure and ground-mounted cabinet on or immediately beside the same verge.

I am not suggesting that a lorry will necessarily collide with the proposed installation. However, the previous incident demonstrates that vehicles do, on occasion, overrun the verge. This makes the position of a substantial fixed structure in this particular location a matter that warrants proper assessment rather than being treated as a theoretical risk.

The Council should consider, amongst other things:

- the swept path of delivery vehicles;
- the turning manoeuvres of large vehicles;
- the possibility of vehicles overrunning the verge;
- the position of the equipment cabinet in relation to those movements;
- the potential for a vehicle to strike the pole;
- the consequences of such an impact;
- the position and protection of the foundations;
- visibility at the junction;
- pedestrian visibility;
- maintenance access;
- construction vehicle access; and
- whether the equipment would reduce the usable space available for vehicle manoeuvring.

The Government's Code of Practice specifically recognises the importance of highway safety, road junctions, visibility and sightlines, and states that equipment should not obstruct existing pedestrian or vehicular access.

Given the known history at this location, I ask that **West Sussex County Council, as Highway Authority, is consulted** and that the applicant is required to provide an appropriate site-specific assessment of vehicle movements and highway safety.

7. Pedestrian access

The proposed pole and cabinet appear to be immediately adjacent to the existing pedestrian route.

The Council should be satisfied that the installation will not make the route more difficult or hazardous to use.

In particular, the applicant should clearly identify:

- the remaining clearance between the cabinet and the pedestrian route;
- the clearance around the pole;
- whether the available pedestrian width will be reduced;
- whether wheelchair and mobility-aid users can continue to pass safely;
- how construction work will be managed without obstructing the route; and
- how future inspection and maintenance will be carried out.

This deserves particular attention because of the restricted nature of the site and the fact that large delivery vehicles also use the surrounding area.

8. The position at the junction is particularly sensitive

The proposed site is located at a road junction rather than in an isolated field or open area.

It is beside a pedestrian route, close to residential properties and within a grassed roadside area used by vehicles.

The Council should therefore be satisfied that the pole and cabinet will not:

- interfere with visibility;
- obscure existing signs;
- affect vehicle manoeuvring;
- create a collision risk;
- affect pedestrian visibility; or
- otherwise compromise the safe operation of the junction.

The previous incident involving a delivery vehicle mounting the verge makes this particularly relevant.

9. Structural and physical safety

The proposed structure would be approximately **13 metres high** and would be located close to the highway and pedestrian route.

I therefore ask the Council to ensure that the relevant structural and physical safety considerations have been addressed, including:

- the proposed foundation;
- ground conditions;
- structural design;
- wind loading;
- proximity to the highway;

- the possibility of vehicle impact;
- maintenance arrangements;
- inspection requirements;
- safe access for maintenance; and
- arrangements for eventual removal and reinstatement.

I am not suggesting that a telecommunications pole is inherently unsafe. My concern is whether a structure of this size is appropriate in this particular location, given the surrounding highway conditions and vehicle movements.

10. Policy EH7 and the character of Haglands Lane

The West Chiltington Neighbourhood Development Plan has now been **made** and forms part of the Development Plan for Horsham District.

Importantly, **Policy EH7 – Sunken Lanes specifically identifies Haglands Lane.**

The policy seeks to ensure that development responds positively to the biodiversity, landscape and amenity value and character of the identified sunken lanes. It states that proposals which would reduce those values and characteristics will not be supported.

The supporting text also recognises these lanes as historic features of the parish, often characterised by mature trees and hedgerows, and notes their contribution to biodiversity and the visual character of West Chiltington.

The proposed installation should therefore be considered in the context of the particular character of Haglands Lane rather than simply as a standard telecommunications installation.

Here, there is a combination of:

- a new 13-metre vertical structure;
- a ground-mounted cabinet;
- visible cabling;
- a road junction;
- a pedestrian route;
- large delivery vehicles using the area;
- established vegetation; and
- the rural character of the lane.

These factors make the choice of site particularly sensitive.

11. Landscape and visual impact

The submitted elevation drawing shows that the proposed pole would extend considerably above the existing hedge.

It would therefore be visible as a new engineered vertical feature from the surrounding road and from nearby properties.

At present, the site forms part of a green roadside setting. The proposed installation would introduce a distinctly utilitarian telecommunications structure into that environment.

There does not appear to be an established group of similarly tall vertical structures immediately around the site into which the proposed pole could naturally assimilate.

It would therefore be a new and conspicuous feature rather than an addition to an existing telecommunications compound or group of vertical infrastructure.

The Government's Code of Practice advises that new masts should, where practicable, minimise their impact on landscape and buildings. This should be given proper consideration here.

12. Effect on nearby residential properties

The proposed installation would be in close visual relationship with nearby residential properties.

While the hedge would conceal some of the lower part of the installation, the upper section of the pole and antenna would remain visible above it.

My concern is not based on property values or unsupported health claims. It is simply that residents would experience a significant change to established views as a result of introducing a 13-metre engineered structure immediately beside the road.

That visual effect should be properly considered when assessing the siting and appearance of the proposal.

13. Biodiversity and existing vegetation

The proposed site is currently a grassed roadside area with established vegetation and hedging.

A maintained grass verge should not automatically be regarded as having no ecological value.

The installation is likely to involve excavation, foundations, underground cabling and disturbance to the surrounding ground. There may also be construction and maintenance activity around the existing vegetation.

The West Chiltington Neighbourhood Development Plan recognises the contribution that the parish's historic lanes, trees and hedgerows make to biodiversity.

I therefore ask the Council to ensure that the existing vegetation and ecological characteristics of the site are properly considered before the application is determined.

I am not suggesting that a statutory Biodiversity Net Gain assessment necessarily applies to this permitted development proposal. The point is simply that the existing ecological function of the verge and hedgerow should not be disregarded when assessing the suitability of the site.

14. The grass verge has an existing function

There appears to be an assumption that the grassed area is suitable for the installation because it is physically available.

I do not believe that availability of space is sufficient justification for the proposed siting.

The verge currently performs several functions. It:

- contributes to the green character of the road;
- forms part of the setting of Haglands Lane;
- provides space alongside the pedestrian route;
- is used by delivery vehicles undertaking turning manoeuvres;
- has previously been overrun by a large vehicle; and
- contributes to the established landscape character of the area.

These existing functions should be taken into account when considering whether it is an appropriate location for a substantial telecommunications structure.

15. Why is a 13-metre pole necessary?

The proposed height is one of the main reasons why the installation would have such a noticeable visual impact.

The applicant should therefore explain why a pole of **13 metres** is required.

If the height is necessary to achieve the required radio coverage, the Council should be provided with the relevant technical evidence.

It would also be reasonable to establish whether the same objective could be achieved through:

- a lower pole;
- a different antenna arrangement;
- an existing structure;
- a different location; or
- a building-mounted solution.

The reference to terrain limitations does not, by itself, establish that 13 metres is required at this particular point.

16. Appearance and mitigation

If the Council is minded to continue considering the proposal, I ask that the applicant provides clear details of the proposed appearance and mitigation measures.

This should include:

- the colour and finish of the pole;
- the appearance of the antenna and modem;
- the colour and finish of the cabinet;
- the treatment of the cable cover;
- the proposed foundations;
- the extent of excavation;
- protection of the existing hedge and vegetation;
- reinstatement of the grass verge; and
- long-term maintenance arrangements.

I recognise that colouring or other measures may reduce visual contrast to some extent.

However, such measures cannot remove the fundamental fact that the proposed structure would be approximately 13 metres high and would extend significantly above the existing vegetation.

17. The wider benefits of the smart metering programme

I recognise that Southern Water's smart metering programme has wider objectives relating to water efficiency and network management.

Those objectives may explain the need for improved communications infrastructure.

However, there is a distinction between **the need for infrastructure generally** and **the suitability of this particular site**.

The existence of a wider public benefit should not remove the need for proper consideration of alternative locations and the specific effects of the proposed installation.

The relevant issue for this application remains whether the siting and appearance of this particular structure are acceptable.

18. Further information requested

Before reaching a favourable conclusion, I respectfully ask the Council to obtain the following information from the applicant:

1. The defined radio-planning and site-search area.
2. Details of all alternative sites investigated.
3. Details of existing telecommunications structures considered.
4. Details of buildings and other structures considered.
5. The reasons why those alternatives were rejected.
6. Technical justification for the proposed 13-metre height.
7. Coverage predictions demonstrating the benefit of this particular location.
8. Confirmation of whether a lower structure has been investigated.
9. A site-specific assessment of highway and pedestrian safety.
10. Swept-path analysis for large delivery vehicles using the turning area.
11. Consideration of the previous incidents involving vehicles mounting the grass verge.
12. Assessment of the potential consequences of a vehicle striking the cabinet or pole.
13. Details of the foundation and structural arrangements.
14. Details of construction and maintenance access.
15. Details demonstrating that adequate pedestrian clearance will remain.
16. Details of underground services and proposed ground disturbance.
17. Details of how the existing hedge and vegetation will be protected.
18. Appropriate information concerning landscape and visual effects.
19. Confirmation that the installation will comply with the applicable radio-frequency exposure requirements.
20. Details of reinstatement and long-term maintenance of the site.

Given the particular circumstances, I also ask that **West Sussex County Council, as Highway Authority, is specifically consulted** regarding the proposed siting.

19. Overall considerations

The proposal would introduce a substantial new telecommunications structure into a location which currently has a predominantly green, low-rise and rural character.

The submitted drawings show that:

- the pole would be approximately 13 metres high;
- it would extend well above the existing hedge;
- the antenna would be clearly visible;
- a ground-mounted cabinet and associated cabling would also be installed;
- the site is immediately adjacent to a pedestrian route;
- it is situated at a road junction; and
- it would be in close visual relationship with nearby residential properties.

The local circumstances make the choice of site particularly important. Haglands Lane is specifically identified under **Policy EH7 of the made West Chiltington Neighbourhood Development Plan**, and the area is also used by large delivery vehicles for turning.

The previous incident in which a delivery lorry mounted the grass verge and knocked down a signpost is further evidence that vehicle movements at this location deserve careful consideration.

The proposal should therefore not be regarded simply as a small communications cabinet with a pole.

It would be a **13-metre structure occupying an active roadside environment**, with potential consequences for the appearance of the area, landscape character, pedestrians, vehicle movements and nearby residents.

20. Conclusion

For the reasons set out above, I respectfully request that **prior approval is refused on grounds relating to the siting and appearance of the proposed development.**

In particular, the application has not, in my view, adequately demonstrated that:

- this is the most appropriate location;
- existing structures have been properly investigated;
- alternative locations have been adequately considered;
- a 13-metre structure is technically necessary;
- the visual impact can be satisfactorily mitigated;
- the proposal responds appropriately to the character and sensitivities of Haglands Lane;
- pedestrian access will remain safe and unobstructed;
- large delivery vehicles can continue to use the turning area safely;
- the history of vehicles mounting the grass verge has been properly taken into account; or
- the installation can be safely constructed and maintained in this constrained roadside location.

The fundamental issue is not whether Southern Water has a legitimate need for improved communications as part of its smart metering programme. The issue is whether the applicant has demonstrated that **this particular grassed roadside location, immediately beside a pedestrian route and within an area used by large vehicles for turning, is necessary and appropriate for a 13-metre telecommunications structure.**

The information submitted so far does not, in my view, adequately establish this.

The applicant's own correspondence states that most of its network will make use of existing telecommunications infrastructure, while the submitted elevation demonstrates the considerable visual effect of introducing a new 13-metre structure at this particular location.

I therefore respectfully ask Horsham District Council to **refuse prior approval for the proposal.**

If the Council is not presently satisfied that refusal is appropriate, I ask that no favourable determination is made until the applicant has provided adequate information addressing the alternative-site search, the technical justification for the proposed height, highway and pedestrian safety, vehicle turning movements, structural considerations, ecological and landscape effects, and the relationship of the proposal to the character and amenity of Haglands Lane.

Thank you for taking the time to consider my objection.

Yours faithfully,

[REDACTED]

Honeypot House, Haglands Lane, West Chiltington, West Sussex, RH20 2QR

[REDACTED] ([REDACTED])

16th September 2026

