

Our ref: COL.MOD.UK.0009796

The Chief Planning Officer,
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant,
PO9 2AX

Email: planning.development@havant.gov.uk

Date: 23rd July 2026

Dear Sir/Madame,

EE Ltd

Submission of an Application for a Prior Approval Determination

**Proposed Alterations to Existing Base Station installation at
WARBLINGTON HAVANT ROAD, HAVANT ROAD, WARBLINGTON,
LANGSTONE, HAMPSHIRE, PO10 7LG (E: 473110 N: 106030).**

On behalf of EE Ltd we submit herewith an application for a prior approval determination for the upgrade of the existing electronic communications installation at the above site. This application follows the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

The application is submitted in accordance with the requirements of Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

- i. The proposal seeks to install a permanent back-up power generator with associated fuel apparatus (10kVA canopied generator). Further, 1no. proposed PSU cabinet to be installed with ancillary development thereto.
- ii. An O.S. site plan scale 1:2500 Drawing No. 00-004 showing the location where the apparatus will be installed.
- iii. Electronic payment of **£701.00** in respect of the application fee
- iv. The Developer's Notice served on the landowner
- v. The Developer's contact details

The following information is also provided to assist with your determination of the application:

- vi. The Authority's 1APP form for telecommunications development prior approval applications
- vii. Drawing reference numbers – **02-100, 02-150** – providing further details of the siting, layout and design of the development
- viii. A certificate of ICNIRP compliance (if available)
- ix. A letter issued by the Home Office dated 14 March 2025

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans.

Developer's Contact Details

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, any correspondence to the developers should be sent to:

For Cellnex UK:

Email: [REDACTED]

For EE Ltd:

Email: [REDACTED]

The Scope of the Prior Approval Determination

The permitted development rights granted by Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the GPDO), exist to facilitate the establishment of modern communications apparatus and infrastructure judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

The permitted development granted subject to the prior approval procedure is similar to the grant of outline planning permission, with details of precise siting and appearance being reserved. This is explained at Annex A Glossary of Code of Practice for Wireless Network Development in England, March 2022 . The National Planning Policy Framework is also accordingly clear that permitted development rights should not generally be withdrawn.

As a consequence, the scope of determination does not extend to whether the site selected is needed, as the development is acceptable in principle due to the rights conveyed by the GPDO. Likewise, whilst information on alternative sites may be supplied by way of background and context, the extent of control on siting is limited to the precise siting on a site and not the general location.

As the principle of development at the application site is permitted by the GPDO, this support letter focuses on the statutory criteria of detailed siting and appearance. In so doing, this is considered against current town and country planning guidance, including the development plan which are material considerations, and with reference to the operational requirements of the operator and the attempts to accommodate the particular requirement.

The Proposed Development

In partnership with Government departments and other partners, the Home Office is replacing Airwave TETRA, the current communications system used by the Emergency Services, with a new system called the Emergency Services Network (ESN). ESN is a critical voice and broadband data communication system running over mobile network. A key requirement of ESN is that it continues to provide coverage for the three emergency services when the service is impacted by events such as power outages, storm damage or vandalism. The Emergency Services Mobile Communications Programme is responsible for delivering ESN for the three emergency services of Fire, Police and Ambulance and to achieve this EE have been instructed to install a new permanent back-up power generator across a portfolio of sites.

The development as proposed comprises:

The proposal seeks to install a permanent back-up power generator with associated fuel apparatus (10kVA canopied generator). Further, 1no. proposed PSU cabinet to be installed with ancillary development thereto.

The emergency services communications network needs to be operational on a continuous basis and therefore it is essential that the site benefits from an emergency 'back up' power supply in case the main grid power supply to the site fails. In practice therefore the back-up generator will only be needed in an emergency situation for example if the existing high power supply to the site is lost.

This minor proposal will provide a back-up emergency power supply for the Emergency Services network and will therefore support the efficiency of the Emergency Services by allowing them to maintain access to the latest type of data and applications as part of the EE Ltd service provided to the wider area.

In keeping with the NPPF and Code of Practice guidelines, in this instance, the proposal is for the upgrade of an existing telecommunications site. The application site has hosted a telecommunications site for a number of years. The proposal will ensure that power resilience is achieved at this site so that the area does not suffer a catastrophic loss of Emergency Services Network and the EE public coverage in the event of a mains power outage.

The proposed generator is the minimum requirement to achieve the required power resilience. The existing fenced compound will be extended slightly to accommodate the proposed generator.

The proposal is for the upgrade of an existing site and as such, no alternative site options were investigated. There is a specific requirement to upgrade the existing site as it is the only site in the appropriate location to provide coverage to the wider area, and the upgrade is required to provide power resilience.

We indicated in our prior engagement letter that the Traffic Light Rating was green. The prior engagement carried out suggests this rating to be correct and we have not altered it.

Compliance with Planning Policy and Guidance

In accordance with the Code of Best Practice on Mobile Phone Network Development, and published Government guidance within the National Planning Policy Framework (NPPF), this proposal has been developed having regard to the need for good design.

Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 131) of NPPF. It states, "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps makes development acceptable to communities". In keeping with the NPPF, guidelines for using "high quality communications infrastructure", the proposed design has been selected to minimise any visual impact upon the designated landscape in which the site is located.

The following general design principles have been taken into account in respect of this proposed telecommunications development within the designated area:

- A proper assessment of the character of the area concerned; and
- That the design shows an appreciation of context.

The apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will, therefore, remain the same as the current arrangements.

The principle of a telecommunications base station installation in this location has already been accepted by your Authority and it has become an established feature within the landscape.

The Government fully supports high quality communications infrastructure. The NPPF states at paragraph 119 that planning policies and decisions should support the expansion of electronic communications networks.

The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact, and the special qualities of nationally important landscapes such as National Parks and National Landscapes (formerly AONB). In keeping with the NPPF the proposed design has been selected to minimise any visual impact upon this designated landscape.

Having regard to the nature and appearance of the structure as a whole, the proposed works should have no adverse impact, or no more than a minimal adverse impact, on its appearance. The development as proposed should not

materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

Local Policy Considerations

As the adopted Core Strategy (2011) does not contain a standalone policy relating to telecommunications, the proposal has mainly been assessed against Policy CS16 High Quality Design of the Local Plan (Core Strategy) 2011 as well as Policy CS12 Chichester Harbour Area of Outstanding Natural Beauty (AONB).

Policy CS16: High Quality Design of the Cores Strategy states that:

“All development should demonstrate that its design:

1. Responds to, draws inspiration from and respects local context and:

- a) Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site;*
- b) Integrates with existing local landscape features, promotes wildlife and biodiversity and/or applies characteristics of the local area into the design of a scheme wherever possible to create variety and interest;*
- c) Uses the characteristics of the locality to help inform the design of the new development including heights, massing, existing buildings lines, plot widths and depths, materials and proportions of windows and doors;*
- d) Is well connected to and integrates with the immediate local area and the wider area by linking to existing pedestrian and cycle routes and encouraging people to use public transport where possible; and*
- e) The development does not cause unacceptable harm to the amenity of neighbours through smell, the loss of privacy, outlook, noise and overlooking....”*

Whilst Policy CS12 Chichester Harbour Area of Outstanding Natural Beauty (AONB) outlines that:

“Development will be permitted where it:

- 1. Carefully assesses the impact of individual proposals, and their cumulative effect, on the Chichester Harbour AONB, and its setting.*
- 2. Is appropriate to the economic, social and environmental wellbeing of the area or is desirable for the understanding and enjoyment of the area.*
- 3. Conserves and enhances the special qualities of the Chichester Harbour AONB (as defined in the Chichester Harbour AONB Management Plan).*
- 4. Meets the policy aims of the Chichester Harbour AONB Management Plan and*
- 5. Provides mitigation of any detrimental effects including where appropriate the improvement of existing damaged landscapes relating to the proposal.”*

The design of the development has been carefully selected to avoid any adverse impact on the special qualities of the Chichester Harbour AONB. The works consist solely of a small canopied 10kVA generator along with 1no. PSU cabinet to be installed within the extended fenced compound. The existing site is located within an area of dense tree coverage situated in between Havant Road (A259) and the A27. The proposed equipment will not be visible whatsoever from the surrounding public roads owing to the density of the surrounding tree line and will therefore have no impact on the sensitive nature of the AONB. The

application confirms that the design approach aligns with the National Planning Policy Framework and the Code of Practice as well as local policies CS12 and CS16 of the Local Plan (Core Strategy) 2011, with the selected equipment and layout minimising visual impact on the designated landscape.

The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator and minimising environmental impact.

The electronic communications site with the addition of the proposed development will continue to comply with the relevant ICNIRP guidelines on public exposure. A certificate confirming ICNIRP compliance can be supplied on request.

We would be willing to meet with you or assist with any visits to the site and the surrounding area, if this is beneficial to the determination of the application.

Finally, your attention is drawn to the statutory 56 days period for the determination of this application of this nature upon which detailed advice is given at paragraph 101 onwards of the Code of Practice for Wireless Network Development in England.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact Eoin Ritchie – WHP Telecoms.

Yours faithfully,



Town Planner
WHP Telecoms LTD



Enc - Planning Drawings and Location Plan