

Mid Sussex District Council

Formal Objection to Planning Application Ref: DM/25/0589

Site: Land at Grid Reference 532037 120185, Leylands Road, Burgess Hill, West Sussex

Dear Planning Officer,

I am writing to formally object to planning application DM/25/0589 for the installation of a 30-metre (approximately 100ft) lattice telecommunications tower, associated antennas, ground-based equipment, and fenced compound at the above site.

This proposal has no benefit to the local community and is entirely inappropriate for a residential and environmentally sensitive area. It conflicts with both local planning policy and national guidance and would cause lasting harm to the local community and environment. My detailed objections are set out below:

1. Unsuitable Location and Lack of Proper Consultation

Placing this kind of infrastructure in the middle of a residential neighbourhood—especially one designated as a local green space protected from development in the Burgess Hill Neighbourhood Plan: G1 Areas of Open Space which the Council wished to see retained—is not in keeping with the principles of good planning. This proposed location is totally unsuitable for a 100ft industrial-style mast and its supporting structures.

What is also troubling is the limited notification of residents. It appears only a small number of nearby households were originally informed, leaving the wider community unaware during the formal consultation period – not helped by confusion over closing dates for representations to be made conflicting with information on the portal. Eventually more residents became aware as they shared their concerns within the community and a growing number of representations were made to the Council. This resulted in the reissuing of the planning notification, with an extended deadline for comment of 27 May 2025.

This unsatisfactory process undermines the inclusive and transparent engagement required under the Town and Country Planning (Development Management Procedure) (England) Order 2015. Residents deserve better, and sufficient time to digest a significant volume of information to fully understand what is at stake—especially when such a significant structure is proposed.

2. Harm to Visual and Practical Amenity

Because of the scale of the structure, this mast would dominate the skyline, standing well above the tree line and visible from all directions. It would be a stark, industrial feature in an otherwise green and residential area, undermining the visual character of the neighbourhood and affecting the enjoyment of nearby homes.

Under Paragraph 130 of the National Planning Policy Framework (NPPF), planning decisions should ensure developments are sympathetic to local character and maintain a high standard of amenity. This proposal does neither.

Our views on this may not be of a formal material consideration, but they are undeniably tied to residents' sense of well-being and mental health. Losing that outlook to a towering metal structure, with the concomitant despoiling of the area, can have real and lasting effects on quality of life.

3. Environmental and Wildlife Disruption

The area has only recently begun to recover from major railway embankment works carried out in late 2020. Introducing a large-scale mast and associated infrastructure risks setting back that recovery—disrupting habitats, disturbing wildlife, and adding further noise and construction impacts. Furthermore, there will be operational noise from the ground based ancillary equipment adding to the disturbance.

The site lies within a sensitive ecological zone, and both the Wildlife and Countryside Act 1981 and the NPPF, Paragraph 174, stress the need to avoid harm to biodiversity and support habitat recovery. This proposal is entirely at odds with those principles.

4. Failure to Properly Assess Alternative Locations

The applicant's dismissal of other sites—based largely on the railway's position in a cutting—is unconvincing. Residents familiar with travelling on the pertinent railway line know this explanation doesn't accurately reflect the diversity of the area's topography, nor the communications signal currently available from the railway. The objective to improve mobile communications for railways commuters can still be met through using a less intrusive site. These alternatives should therefore be comprehensively examined. I would conjecture that the applicant has simply chosen the easiest site for access and development, regardless of other considerations and the interests of local residents.

A development with such clear negative impacts should only go ahead after a thorough and transparent exploration of all viable alternatives. Paragraph 81 of the NPPF underlines the need to ensure that developments are well-placed to minimise harm—and that simply hasn't happened here.

5. Impact on Property Values and Mental Health

While the local authority's guidance may exclude considerations such as the 'loss of view' or 'loss of property value,' these legitimate concerns should not be dismissed lightly. Research has consistently shown that the introduction of large communication masts in residential areas can lead to a decline in property values as well as negative impacts on residents' mental health, due to the visual intrusion and perceived degradation of local amenity.

Although these are not formally recognised as material considerations, the broader social

and economic implications of the proposal must be taken into account by the Council, as they directly affect the well-being of local residents.

6. Public Concern over Electromagnetic Radiation and Health

Although the applicant has submitted a Declaration of Conformity confirming compliance with ICNIRP guidelines and the EU Council recommendation 1999/519/EC for public exposure to electromagnetic fields, this alone doesn't resolve wider community concerns.

Many members of the public—rightly or wrongly—remain worried about the health implications of EMF exposure, particularly around 5G infrastructure. These concerns, even if not always supported by current science, can have real psychological impacts. They often lead to anxiety, mistrust, and a sense that decisions are being made without full transparency or sensitivity to public feeling.

While EMF compliance may satisfy technical planning requirements, it does not address community wellbeing, which is an important aspect of planning under Paragraph 92 of the NPPF, which calls for healthy, inclusive, and safe communities. Again, the Council has a duty to consider not just technical safety, but also the perceived and emotional impacts on local residents, particularly when such infrastructure is proposed close to homes and public green spaces.

7. Lack of Future Safeguards Amid Rapid Technological Expansion

While the ICNIRP Declaration submitted as part of this application asserts compliance with current RF exposure guidelines, this is based on a snapshot of the equipment proposed now—at specific frequencies, modulation schemes, and power levels. However, the UK Government has made clear its ambition to provide comprehensive 5G and fibre connectivity across the country, and this mast forms part of a long-term infrastructure programme led by Network Rail and private operators under a 25-year concession.

This raises serious questions about the future evolution of the site. Once approved, there is a high likelihood that the mast will accommodate more antennas, serve additional operators, or operate across wider frequency bands to support expanded 5G rollouts—all of which could alter the visual, environmental, and technical impacts on the local area.

Residents are therefore being asked to accept a structure whose true long-term scale and implications remain uncertain, with no clear mechanism for future oversight or meaningful community consultation on upgrades. This lack of future safeguard or conditional limitation should be a significant consideration in determining the appropriateness of the current application.

Moreover, there are legitimate concerns about 'site creep,' whereby an initially modest installation gradually expands over time through a series of incremental changes. Under current planning law, certain upgrades and modifications may be permitted development and not subject to full public consultation or planning approval. This creates a loophole that

could allow the site to grow substantially without adequate scrutiny, further eroding local trust and compromising the character and amenity of the area.

8. Sensitive Location: Proximity to School and Watercourse

The proposed development site, located at National Grid Reference 532106, 120277, is situated in an area with multiple environmental and community sensitivities. Notably, the mast would be positioned within wider proximity to a Primary School, raising understandable concern among local parents and residents about placing telecommunications infrastructure so close to a learning environment for young children. Moreover, many children use the pathway adjacent to the proposed mast site when going to and from the school, thereby increasing their potential risk of higher levels of exposure.

While ICNIRP compliance may technically satisfy exposure limits, the perceived risks of electromagnetic radiation—particularly in relation to children—can generate considerable community anxiety, which is a valid planning consideration under Paragraph 92 of the NPPF.

Additionally, the presence of a stream near the railway embankment suggests a hydrologically sensitive site. Construction and maintenance activities associated with the mast risk affecting water flow, quality, and the ecological integrity of the riparian environment. No clear mitigation or ecological assessment appears to have been submitted addressing this proximity.

9. Inappropriate Site Layout and Environmental Risk

The site plan submitted as part of this application (Drawing Ref: S5-13A MD003 3.A) confirms that the proposed development would occupy sloping terrain adjacent to the railway embankment, in an area featuring mature trees, dense undergrowth, and drainage infrastructure. The layout involves significant clearance of natural vegetation, removal of a dead tree, and regrading of the soil, which together risk substantial disruption to the existing ecology.

A stream and underground sewer are shown near the compound boundary, raising additional concerns about construction runoff, contamination risk, and long-term drainage management—none of which are addressed in the application's documentation. The compound's proximity to a watercourse necessitates a full environmental impact assessment, which appears absent.

Moreover, the proposed visual screening is inadequate. The use of 60–80cm hedge whips with a maximum permitted growth height of 3m will be entirely ineffective in concealing a 30m mast. Indeed, because of the scale of the structure, it is doubtful that this could be achieved in any significant way. This does not meet the standards expected for meaningful landscape mitigation in a residential setting.

The access route traverses a pedestrian path, creating potential safety hazards and long-

term disturbance to the public. No detail is provided on traffic management or protection of pedestrian access (also relevant regarding children safety vis a vis school route) during construction or future site servicing.

10. Inadequate Ecological Information and Risk to Protected Species

Ecological advice issued to the Local Planning Authority (Place Services, 8 May 2025) has confirmed that insufficient ecological information has been provided to support the lawful determination of this application under de facto UK law. Notably, the removal of up to three dead trees with Potential Bat Roost Features (PRFs) triggers the requirement for further surveys in accordance with Bat Surveys for Professional Ecologists (BCT, 4th Edition, 2023).

Bats are European Protected Species, and failure to assess or mitigate impacts appropriately places the Local Authority at risk of non-compliance with its statutory duties under the Conservation of Habitats and Species Regulations 2017, Section 40 of the NERC Act 2006, and the Crime and Disorder Act 1998.

Lighting impacts on local bat populations have also not been addressed with a suitable Wildlife-Friendly Lighting Strategy, as recommended by ILP Guidance Note 08/23.

Granting approval in the absence of these pre-determination surveys would risk an unlawful planning decision. The application should be refused or deferred until full ecological data and mitigation strategies are made available and publicly scrutinised.

Conclusion

This proposal is wholly out of place in its proposed location. There is little perceived benefit, if any, to the local community. It conflicts with key principles of the NPPF, the Town and Country Planning Act 1990, and local development policies, all of which seek to protect residential amenity, the natural environment, and community interests.

Moreover, approval of this mast would risk setting a precedent for the positioning of large commercial telecommunications infrastructure in wholly inappropriate residential and environmentally sensitive locations.

I sense that many local residents feel that this proposal has progressed without sufficient and meaningful public involvement. Approval under such circumstances would further erode trust in the Council and the planning system.

My final caveat: should the Council be minded to approve this application, I strongly urge that any consent be subject to strict planning conditions limiting future expansion, requiring public consultation for any upgrades or operator sharing, and mandating pre-commencement ecological surveys and mitigation.



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