



PROPOSAL FOR 18m 5G MONOPOLE AND STREET CABINETS ON COMMONSIDE WEST

Application number 20/P2489

August 2020

1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs. We are the civic society for this part of Merton and part of the wider civic movement through membership of the national charity Civic Voice. We have been closely involved in the development of the Merton Local Plan, Borough Character Studies, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. Our approach to development and change in the area is established in the Cricket Green Charter which was refreshed in 2019 with the support of London Borough of Merton and local councillors (<https://mitchamcricketgreen.org.uk/cricket-green-charter/>). The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We have also contributed to production of the Merton Heritage Strategy as a member of the Merton Heritage Forum. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run Mitcham Heritage Day and Community on the Green. We ask that these representations are made available online through Planning Explorer.

2. The proposal for an 18m 5G monopole and street cabinets at the entrance to Park Place lies in the heart of Mitcham Cricket Green Conservation Area where new development must "*preserve or enhance*" the Conservation Area. It is located in an area of significant open space, comprising both Three Kings Piece and the historic landscape associated with both Park Place and The Canons. It lies within a key view of the Grade II listed Park Place, a designated heritage asset.

3. The height of the proposed mast is unparalleled in the area and, contrary to the views expressed by the applicant; it will be highly prominent and visually intrusive. No information is provided to assess the impact on the Conservation Area or other designated heritage assets or to indicate the area affected by the visual impact of the proposal. The proposed street cabinets will also be visually intrusive at a key entrance to the grounds of Grade II listed Park Place as well as being a physical obstruction on the pavement.

4. The applicant has failed to demonstrate why this infrastructure needs to be erected within the Conservation Area and why it is "*necessary for H3G Ltd business development*" and the "*only viable solution*". Even on the basis of the information provided there are locations nearby and outside the Conservation Area which would be more suitable and which have not been considered. 5G masts can also be placed on buildings.

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5. We also note inconsistencies in the information provided with the application form and other documents. Some state that no pre-application advice has been provided by Merton Council while the covering letter states that "*The identification of this location follows pre- application discussion with your Department*". Trust in the quality of analysis behind the application is further undermined by the applicant not providing a locational map for the four alternative locations which it is stated have been explored as well as misspelling the street names for two of them.

6. The applicant's limited grasp of the significance of the Conservation Area is demonstrated in the statement in the SSSI statement that "*the Conservation Area will, however, be both preserved and enhanced with improved connectivity and coverage*". The extent of 5G coverage is irrelevant to the legal basis on which Conservation Areas are protected rendering this statement meaningless.

7. As with the recently refused application for a similar structure opposite 188 Merton High Street (20/P1391) the application will lead to a dilution of the visual amenity deriving from implementation of the planning application for The Canons in support of the Lottery-funded project (17/P1449 and subsequent applications). This includes land directly affected by the visual impact of the proposal which is also sited on a key route into the historic landscape of The Canons and Park Place.

8. Given these impacts and the lack of supporting information we believe it essential that an application is submitted for prior approval. We believe the proposal is in conflict with Policies CS13, DM D1, DM D2, DM D6 and DM T5 and will harm the Conservation Area and designated heritage assets. Approval should be refused.