



PROPOSAL FOR 15m 5G MONOPOLE AND STREET CABINETS ON HALLOWFIELD WAY
Application number 21/P3471
October 2021

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. This proposal for a 15m 5G monopole and street cabinets is prominently located on Hollowfield Way. It is adjacent to Mitcham Cricket Green Conservation Area and Benedict School and will be visible from the Grade II* listed Mitcham Parish Church.
3. The proposed mast will be a dominant feature. It is nearly double the height of existing street lights and trees and considerably higher than even the tallest school buildings adjacent to the proposed location. We believe the mast will introduce a discordant structure near to the gateway to Mitcham Cricket Green Conservation Area and be a source of significant visual intrusion, including causing harm to the setting of Grade II* listed Mitcham Parish Church and being inappropriate to locate so close to Benedict School. It will be a cause of pavement congestion and will increase the risk of traffic accidents in Hollowfield Way where conflicts between lorries and school children are already a regular occurrence.
4. The location is also unsuitable because any development on Hollowfield Way will be transitory given the recent planning consent for 850 homes to be built on Benedict Wharf. This will result in a significant remodelling of Hollowfield Way. The proposed site is also on the preferred route of the Tramlink extension to Sutton which will also require relocation of the mast.

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5. There is no confidence in the application details provided. They are riddled with inaccuracies even down to the proposal being wrongly located:

(a) Confused consultation – it is stated both that *“The identification of this location follows pre- application discussion with your Department”* and that *“No”* assistance or prior advice been sought from the local authority about this application. Both statements cannot be true. It is also stated that the applicant has consulted neighbours and the local community about the application when no such consultation has occurred. The provision of meaningless additional detail about the consultation referencing a nature conservation designation - *“Please refer to SSSI”* – adds to the confused approach.

(b) Residential location - the applicant acknowledges the amenity impact of the development in a residential area by stating that:

“The area is residential in nature and to address any potential residential amenity issues as much as possible the proposed monopole and associated equipment has been placed in close proximity to commercial uses.”

The chosen location is in reality between Benedict School and housing along Church Path. It is distant from and not in *“close proximity to”* commercial uses and the majority of the land currently in commercial use at the far end of Hallowfield Way on Benedict Wharf has planning permission for residential development.

(c) Phantom lighting columns - the applicant states that the site has been:

“selected to minimise visual impact upon the street scene by integrating with the existing street furniture, having similar vertical lines and overall appearance to the numerous street lighting columns in this area”

In reality there are very few lighting columns along Hallowfield Way and the mast will be an alien feature.

(d) Wrong location - We find it beyond extraordinary that the applicant is unable even to identify the proposed location for the mast correctly. The application details state *“Option 1 (red marker) – This is the option identified in this application.”* In fact Option 1 (red marker) shows the location of the mast in Miles Road adjacent to Mitcham Parish Church that has been rejected (Planning Application reference 21/P1443). The application is further south and on a different road.



8. The application should not be determined. It should be rejected on grounds of being supported by inadequate and inaccurate information. This should be corrected and a new application submitted for determination.

9. We believe there are preferable and suitable locations for a 5G mast. The application is outside the cell search area (shown in red). This provides further evidence that the *"extremely small, constrained search area for this cell"* is not as small or constrained as has been presented. This offers more flexibility in site location. There are alternative and less damaging sites available even within the area of search, including within designated industrial areas, and the applicant has not provided reasoned justification for the chosen site on the basis of any published assessment of alternatives.

10. Additionally, the information presented relates only to the applicant's own sites and it fails to provide any details on the discounted options D1-D7. As a result they cannot be independently assessed. It is notable that option D7 in Hallowfield Way is rejected in the site selection process as being *"Discounted due to insufficient pavement width"*. We agree, especially given the impact of heavy good vehicles parked along the length of Hallowfield Way providing further obstruction and the sensitivity of the location outside a school. Yet this rejected location is the site now under consideration.

11. The applicant's approach does not address the National Planning Policy Framework's expectation that *"the sites for such installations, should be kept to a minimum"* (para 113), including by sharing. The National Planning Policy Framework also states that *"for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure"* (para 115) should be provided. There is no evidence of the necessary exploration. The applicant only provides information on there being no appropriate location for a *"greenfield mast"* option and provides no evidence for even this assertion. Nor is there any evidence that 5G provision cannot be provided on an existing structure. Mitcham Parish Church is a local example of where telecommunications apparatus in its tower supports high quality communications in a manner sympathetic to the historic environment.

12. We are also concerned by the applicant's pre-emptive action in undertaking streetworks even before determination of this application and look to Merton Council to undertake appropriate enforcement action.



13. Without a considered and strategic view about the most appropriate way to support development of the 5G network in the area the applicant has failed to demonstrate why this infrastructure needs to be erected in this location and why it cannot be placed on an existing building or in a less sensitive location. Given its harmful impacts and the lack of necessary supporting information we believe the proposal should be rejected. We believe the proposal is in conflict with Policies CS14, DM D1, DM D2, DM D4 and DM D6 and will harm the Conservation Area and designated heritage assets. Approval should be refused.