

Ms Henriette Collins,
Planning Office,
Spelthorne Borough Council,
Knowle Green,
Staines, TW18 1XB
28TH March, 2012

From: Hon. Chairman, Lower Sunbury Residents' Association (LOSRA)

Dear Ms Collins,

Your ref: 12/00326/T56

I refer to the letter from Head of Planning and Housing Strategy of 22nd March 2012, and SBC's Publicity Schedule also dated 22nd March, regarding the application to erect a 12.5 metre high monopole and radio equipment cabinet on land at the junction of Green Street and Croysdale Avenue, Sunbury.

Please treat this representation as one of strong opposition to the application for the following reasons:

- ☐ The application itself, at Item 7, page 2 asks the question *"Have you consulted neighbours or local community about the proposal?"* The applicant answered *"Yes"*. Under 'Supplementary information' the applicant expands on his answer by claiming to have consulted Halliford and Sunbury West, and East, ward councillors along with the local MP. He then claims that *"No comments received"*. Well of course none were received; the Company, intentionally or otherwise, did not ask the right people. Why for example would the local MP possibly involve himself in a local government matter? This was no less than a shameless box-ticking exercise.
- ☐ A justification for site selection is that *"There is other street furniture in the area including lighting columns and a bus stop"* as though that's a plus point. It is precisely because of the existing furniture that residents are so anxious that no more should be added. The applicant doesn't stop there, to wit: *"There are also a number of trees in the area which would provide a good level of screening to the proposed development....it is considered that the chosen option keeps this impact to an absolute minimum."* This statement is manifestly untrue. One only has to look at the plan to see just how risible is such a claim.
- ☐ The Site Selection Process begs further questions. Having had previous experience of alternative site searches in relation to planning applications, I have become accustomed to viewing these with extreme scepticism. I see, for example, that the Sunbury Telephone Exchange is *"not commercially viable"* which can of course be interpreted as : *"We can do this cheaper elsewhere"*. Also, *"Existing Orange installation not a sharable structure"*. The applicants should be asked to provide documentary evidence to support these claims. With

regard to the Orange installation in particular, no comment is made about possible co-location (as distinct from sharing).

- Under 'Additional relevant information' the form states: *"It is therefore considered the development would not harm the quality or quantity of open space in the area."* Had the applicants consulted the residents they would quickly realise just how absurd is this claim and should be reminded of Para. 123, Code of Best Practice which states that *"Siting [of telecoms masts] should be undertaken with care and sensitivity."*
- The Local Planning Authority will be all too aware that the proposed site is part of the old TP26 transport link which has now been formally adopted as the Linear (Hawke) Park. The Council, after a great deal of public consultation, has embarked upon a well planned and sensitive landscaping project which will not reach its maturity for some seasons to come. The protection or enhancement of sightlines and open vistas are integral to their design intentions. For the applicants to state that *"this proposal has been designed in such a way as to minimise its visual impact upon the surrounding area"* is nothing more than empty rhetoric. One only has to look at the drawing accompanying the application to see how this claim simply doesn't stand up.
- Finally, a declaration of conformity with ICNIRP Public Exposure Guidelines is supposed to have been attached to the application but the declaration does not appear to have been included in the relevant documents.

Policy Considerations

In conclusion, I believe this application should be refused on the following grounds contained within the Core Strategy and Policy Development Plan:

Policy EN8 (d) *'permission should be refused where development would have a significant harmful impact on the landscape.'* In addition to the imposition of unwelcome additional street furniture, there is a real concern that the junction box will attract 'tagging' by graffiti artists. This fear is very real given the repeated defacement of the nearby bus stop.

Policy EN4 (d) *'retaining existing open space in the urban area, used, or capable of use for recreation or having amenity value where (ii) the site as a whole is clearly visible to the general public from other public areas and its openness makes a significant contribution to the quality and character of the urban area by virtue of its prominence, layout and position in relation to development in the locality.'* The exceptions detailed at (e), (f), and (g) of EN4 make no mention of telecommunications equipment.

I note that this is a delegated decision so would urge you to refuse this application.

Yours sincerely,

John Hirsh,

Hon. Chairman, 21, School Walk, Sunbury TW16 6RB www.losra.org