


108 Heath Way

Horsham

West Sussex

RH12 5XS

04/03/26

DC/26/0342 – Proposed 20m high Valmont Phase 7.2 streetworks pole with wraparound cabinet new root foundation. Installation of 3 no. antennas and 6 no. apertures installation of 2 no. 300mm dishes installation of 2 no. GPS nodes on top of streetworks pole. Installation of 5 no. cabinets on new concrete foundation. The installation of ancillary equipment for the purposes of telecommunications development.

Dear Mr Nye,

I am writing to you in my capacity as a local resident, living at 108 Heath Way and as a professional local authority Principal Transport Planner (Development Management). I have extensive experience of assessing and determining these types of cases. Although the applicant is using General Permitted Development Rights, any development should be good development and not compromise the local community or local highway network.

I wish to raise a **formal objection** to the proposals on a number of transportation and highways grounds, which I will outline below.

1. Planning history

T-Mobile previously submitted an application for a mobile mast in the same location. This application was never developed. Therefore there is planning history to suggest that the site is an inappropriate location.

2. Site location

It is noted with interest that the site has an amber RAG evaluation. In the submission, the applicant has not provided any commentary as to why the site is the preferred choice and what other sites were considered and the reasons for their rejection by the applicant.

The site identified by Hutchison 3G and EE is excessive duplication, since there is another site for the company approximately 250 metres from the proposed site. The pre-existing site is at the entrance to North Heath Industrial Estate on North Heath Lane. This monopole has been upgraded in recent years for 5G. The close proximity of another monopole is excessive duplication and from a Local Planning Authority perspective a valid argument to contribute towards a refusal.

Even if the pre-existing site at the end to North Heath Industrial Estate on North Heath Lane was decommissioned, the proposed site in comparison to the existing site is sub-optimum due to its impact on the local community and highway.

The site is a sub-optimum site in that it is in a heavy footfall area with the nearby Coltsfoot Drive shops which are heavily used at all hours.

The proposed site is on a core walking route to North Heath Lane school and Holbrook Primary School. It is on a Safer Routes to School route.

3. Highways considerations

The submitted plans are wholly inadequate from a Highways perspective since the applicant has not shown on relevant plans the dimensions of the proposed monopole and cabinets. It is unclear how far the proposed infrastructure is set back from the kerbside.

The size of the monopole, 20m is excessive. Given that typical street lighting on residential distributor/primary roads is typically 8 metres in height, this represents a significant variation in height, over double the height of typical street lighting. This represents a significant highways risk to motorists being distracted by infrastructure that is significantly out of conventional sightlines when compared to street lighting.

It is unclear how the proposed monopole will align with existing street furniture, e.g. street lighting. It should be noted that a pre-existing dog waste bin is on the proposed development site and close to a pelican crossing cabinet.

A phone monopole, particularly one emitting 5G or high-power radio frequencies, can cause electromagnetic interference to nearby sensitive electronic equipment, such as a pelican crossing cabinet, through induction, conduction or radiation. This interference can cause the cabinet's circuits to malfunction, potentially creating dangerous or faulty pedestrian crossing signals. Given that the North Heath Lane pelican crossing is less than 5m from the pre-existing crossing cabinet.

The North Heath Lane pedestrian crossing is an integral crossing point for the local community and on a school route to North Heath Lane Primary School. Therefore, under no circumstances should any telecommunications equipment be placed adjacent to the crossing cabinet.

North Heath Lane is a heavily trafficked road with issues of speeding and vehicles not always obeying the crossing lights. Therefore, in the interests of highway safety and to promote Vision Zero principles, this is another robust justification for refusal.

It needs to also be remembered that a lot of the children using the crossing will be under 8 (the age at which children typically develop a full road safety understanding), thus any potential malfunction of the crossing could have serious detrimental consequences for the children.

4. Public realm and place making

The grass verges on both sides of North Heath Lane have in recent years, already seen telecommunications apparatus installed, e.g. a Virgin Media cabinet on the grass verge at the corner of the junction of Heath Way. Excessive street furniture, which does not make a positive contribution to place making, health and wellbeing goes against Healthy Streets and public realm principles.

The area of hardstanding outside the Olive Tree café frequently has outside chairs and tables for visitors to sit and relax and socialise. This is particularly popular with school parents after drop-off time and before-pick up time from both North Heath Lane and Holbrook Primary Schools. Installation of such apparatus will detract from the public realm and have an adverse impact of people's health and wellbeing.

5. Active Travel

With new development in the area, e.g. re-development of the former Novartis site, there will be increased demand on local amenities such as Coltsfoot Drive shops and as such there will likely to be increased footfall from pedestrians visiting the shopping parade. Additionally, such new development, is likely to increase demand for short-stay cycle parking at the shopping parade. The proposed development site could potentially be used to locate additional Sheffield stands for visitors to the shopping parade.

More generally, the proposed monopole and equipment takes up valuable space, which pedestrians may use, in times when there is heavy footfall. The cluttering of the kerbside will lose this opportunity.

For cyclists the kerbside on North Heath Lane is a possible mounting/dismounting opportunity since the pre-existing Sheffield stands are located closely where the proposed monopole and cabinet are to be located.

The proposed location could potentially create a pinch point being adjacent to the entrance to the shopping parade. It is directly opposite where dogs are tied up. The area is a very active area and thus the location is wholly inappropriate due to the high footfall experienced.

6. Accident data

The applicant has not given any consideration to the monopole's proposed location and the correlation of collision (Killed, Seriously Injured (KSI)). The location is not only on a heavily trafficked North Heath Lane but adjacent to the mini roundabout between North Heath Lane and Coltsfoot Drive. There is already a high incidence of near misses and accidents. Any infrastructure that could represent a further distraction and increase the risk of accidents should be actively discouraged in the interests of road safety.

7. Installation

The applicant has not provided any details whatsoever as to the installation method and mitigation measures to protect pedestrians and vulnerable road users. As a an absolute minimum the applicant should submit an Installation Method Statement in which it is required to adhere to the following:

- A detailed work programme of the works.
- Details of the method of installation.
- Agree to avoid any works during high-peak hours (08:00-09:00 and 17:00-18:00) and at school drop-off/pick-up times (08:00-09:00 and 15:00-16:00).
- Outline measures to protect pedestrians and vulnerable road users, e.g. details of temporary diversionary footways/any footway closures, suspension of cycle parking/parking bays etc.
- Specify the frequency of washing down footways and the highway.
- Outline the location of the works compound and how installation deliveries will be managed.
- Undertake a highway dilapidation survey prior to works commencement, with the baseline asset condition agreed with the Local Highways Authority.
- Agree to a s278 agreement in which it will make good any footway or highway damaged as a result of the works.
- How it will mitigate any Electronic Magnetic Interference risk to the adjacent pelican crossing on North Heath Lane.

The Installation Method Statement should be secured by way of a pre-commencement condition.

8. Servicing

No details have been given as to the frequency and servicing requirements for the proposed installation. This should be outlined in supporting evidence.

9. Summary

The above-mentioned issues outline why from a transportation planning and highways perspective this proposal must be refused, despite having General Permitted Development Rights. The proposal gives rise to numerous serious transport and highways issues and is not supported by national and local transport policies. Allowing this proposal to continue, in its current state would set a dangerous precedent. The very fact that the same site has been previously refused, albeit several years ago gives rise to material consideration that it is simply not an appropriate site. If it was not a suitable site previously, why could it be deemed appropriate nowadays?

In light of this, I must state that I register a **strong objection** to the proposal on the grounds of transportation and highways impact. National Planning Policy Framework notes that any development can be refused on grounds whereby the transportation or highways impact would be significant on the local community or highway network. In this case, for the above mentioned reasons, this should be applied.

Yours sincerely,

A solid black rectangular box used to redact the signature of the author.