

## Planning, Taxi Licensing and Rights of Way Committee Report

**Application No:** P/2017/0708

**Grid Ref:** 309390.37 297150.1

**Community Council:** Tregynon Community Council

**Valid Date:** 22/06/2017  
**Officer:** Dunya Fourie

**Applicant:** CTIL And Telefonica UK Ltd 260 Bath Road Slough Berkshire SL1 4DX

**Location:** Land at Ty'n y Bryn Farm Tregynon Newtown Powys SY16 3PG

**Proposal:** Full Installation of a 17.5m high tower supporting 3 no. antennas and 2 no. dish antennas together with ground based equipment cabinets and ancillary development

## Update Report

### Appendix 1: Public Representation

- SKMBT\_C224e17082113370
- SKMBT\_C224e17101710120

### Appendix 2: Additional information provided by the applicant

- CTIL Health and Mobile Phone Base Stations Document v 6
- TEF 51021 - Letter - Powys - 11-10-2017

# **NEO FABRICATION & ERECTION LTD**

The Unit  
Whitegates  
Tregynon  
Nr Newtown  
Powys SY16 3PG  
Tel:  
Fax:

21/08/17

F.A.O Dunya Fourie

Ref P/2017/0708

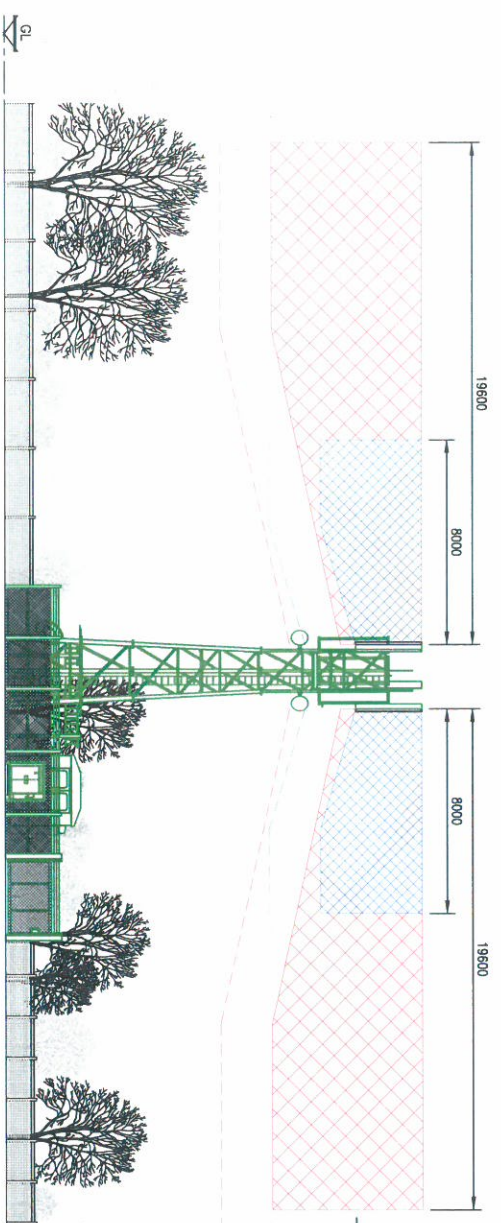
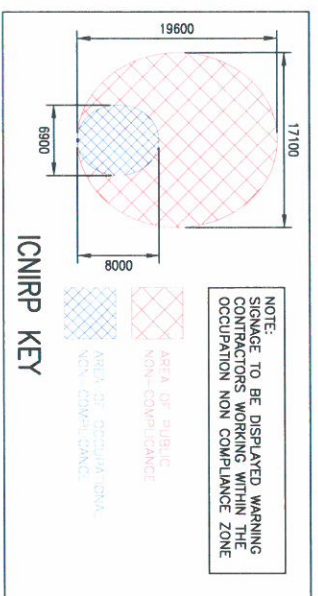
I should imagine that all mobile phone substations are the same.

Please find attached 2 drawings.

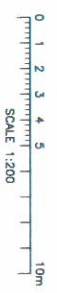
We would be in the Blue Zone plus the Red Zone

Regards

Noel Owen



**PROPOSED ICNIRP EAST ELEVATION**  
SCALE 1:200



ICNIRP EXCLUSION ZONE ARE BASE ON VALUES WITHIN THE MENL RD1010102 ICNIRP COMPLIANCE CERTIFICATION DOCUMENT GSDD008

PROPOSED SITE TYPE OF GF (800)

USED VALUES FOR EE ONLY

PROPOSED WORKS: EAS NEW BUILD SITE

PROPOSED ANTENNA TYPE: COMMSCOPE LDX-6516DS-BTM

PROPOSED BEARING: 8°/147°/308°

PROPOSED ANTENNA HEIGHT C/L: 15.0m

FRONT DISTANCE PUBLIC: 19.6m

FRONT DISTANCE OCCUPATIONAL: 8.0m

COMPLIANCE DISTANCES BASED ON THE FOLLOWING EQUIPMENT POWER: 800MHz - 80w

N.G.R		E: 310575		N: 298895	
UPGRADE REFERENCES					
DOES THE SITE DESIGN CONFORM TO HD014? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
IF NO DETAIL THE EXCEPTIONS BELOW					
1.					
2.					
ICNIRP DETAILS - RD10102/GSDD008					
ACCESS CLASSIFICATION CONTROLLED					
DESIGN CLASSIFICATION PUBLIC					
REV	DESCRIPTION	BY	CH	DATE	
B	ILL EXCLUDED	LDX	LDX	28.08.17	
C	Site layout for Public Use	LDX	LDX	28.08.17	
A	Stand for Approval	LDX	LDX	31.05.17	

**CLARKE telecom**

Unit E, Madison Place, Northampton Road,  
Warrington, Cheshire, WA9 9DU  
Tel: 0151 395 8500  
Fax: 0151 395 8501  
Web: www.clarke-telecom.com

THIRD PART REF: N/A

SITE REF: EAS0048

Site Name: Issue

Site Address / Contact Details: C

Drawing Title: ICNIRP ELEVATION					
Drawn By / Date	Checked By / Date	Approved By / Date			
AT 31.05.17	SGF 31.05.17	SS 31.05.17			
IEA OPT Letter	DRG Type	DRG No	REV		
A	GA	108	C		

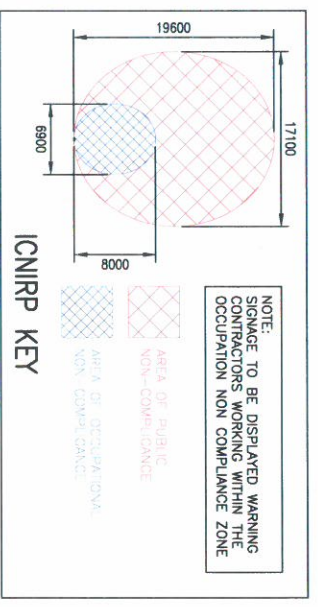
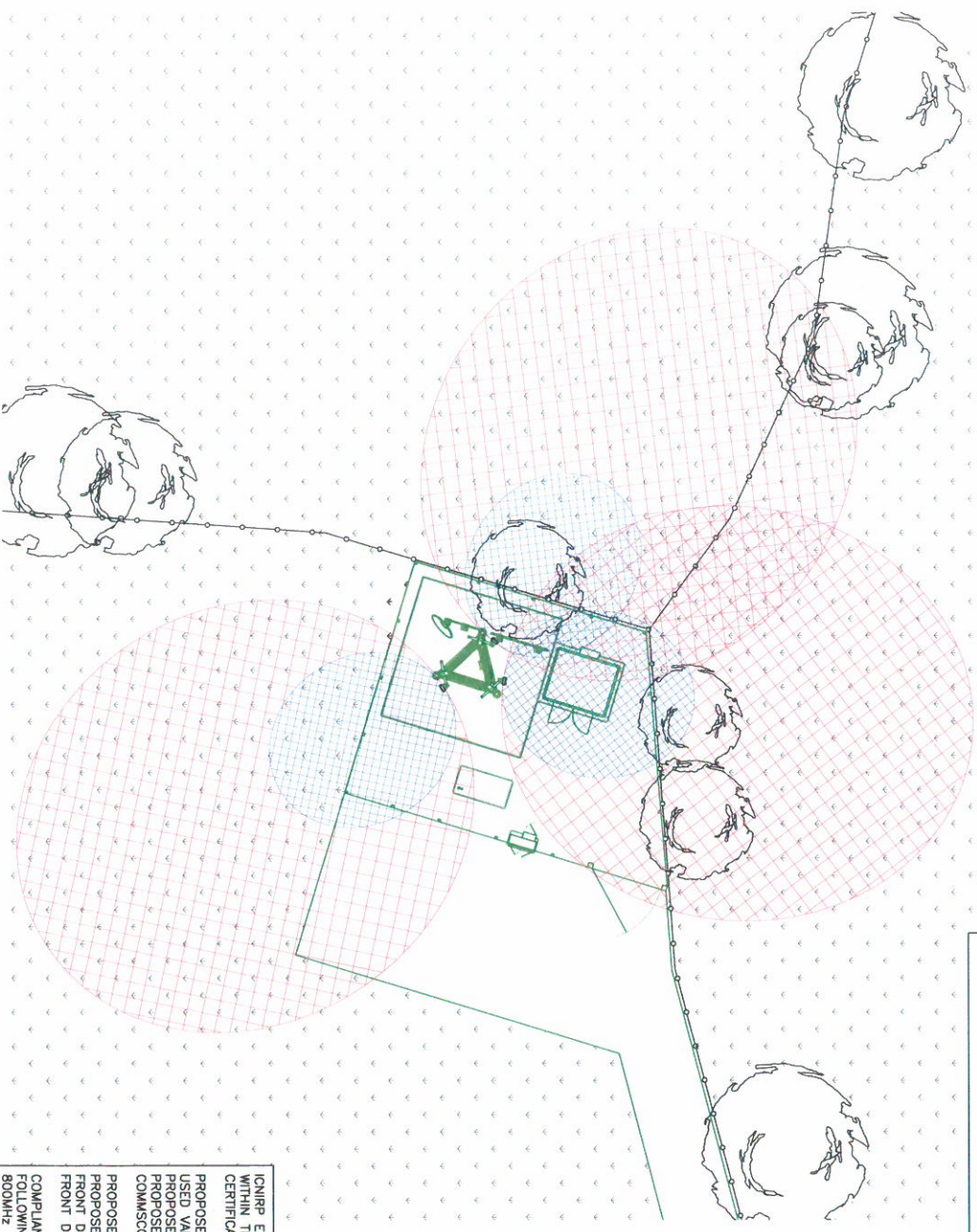
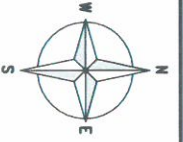
**Home Office**

**lendlease**

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ALL DIMENSIONS IN MM UNLESS OTHERWISE STATED

CONSTRUCTION TO BE IN ACCORDANCE WITH OTHER RELEVANT DRAWINGS



NOTE:  
SIGNAGE TO BE DISPLAYED WARNING CONTRACTORS WORKING WITHIN THE OCCUPATION NON COMPLIANCE ZONE

ICNIRP KEY

- AREA OF PUBLIC NON-COMPLIANCE
- AREA OF OCCUPATIONAL NON-COMPLIANCE

PROPOSED ICNIRP PLAN  
(1:200)



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ALL DIMENSIONS IN mm UNLESS OTHERWISE STATED  
THIS DRAWING TO BE READ IN CONJUNCTION WITH OTHER RELEVANT DRAWINGS.

N.G.R. E: 310575 N: 298895  
UPGRADE REFERENCES

DOES THE SITE DESIGN CONFORM TO RD10/14	YES	NO
IF NOT DETAIL THE EXCEPTIONS BELOW:	<input checked="" type="checkbox"/>	

ICNIRP DETAILS - RD10102/GSDDD08  
ACCESS CLASSIFICATION CONTROLLED  
DESIGN CLASSIFICATION PUBLIC

REV	DESCRIPTION	DATE	BY	CHK
0	ICNIRP Details from tender model	18/04/17	A	SS
1	ICNIRP Details from tender model	20/04/17	A	SS
A	Revised for Approval	31/05/17	A	SS
	MODIFICATION		BY	CHK



THIRD PARTY REF.	SITE REF.
N/A	EAS0048
Site Name	Issue
	C
Site Address / Contact Details	

ICNIRP EXCLUSION ZONE ARE BASE ON VALUES WITHIN THE MBNL RD10102 ICNIRP COMPLIANCE CERTIFICATION DOCUMENT GSDDD08  
PROPOSED SITE TYPE OF GF (800)  
USED VALUES FOR EE ONLY  
PROPOSED WORKS: EAS NEW BUILD SITE  
PROPOSED ANTENNA TYPE:  
COMMSCOPE LDX-6516DS-BTM  
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FRONT DISTANCE PUBLIC: 19.6m  
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COMPLIANCE DISTANCES BASED ON THE FOLLOWING EQUIPMENT POWER:  
800MHz - 80W

Drawing Title: ICNIRP PLAN			
Drawn By / Date	Checked By / Date	Approved By / Date	
AT 31/05/17	SGF 31/05/17	SS 31/05/17	
IEA OPT Letter	DRG Type	DRG No	REV
A	GA	107	C

Noel Owen and NEO Fabrications Ltd  
Corndon View  
Tregynon  
Newtown  
Powys  
SY16 3PG

16th October 2017

Dear Dunya,

**Application description: Full Installation of a 17.5m high lattice tower supporting 3 no. antennas and 2 no. dish antennas together with ground based equipment cabinets and ancillary development**

**Application ref: P/2017/0708**

**Applicant: CTIL And Telefonica UK Ltd**

Further to my previous letter of objection to the above application dated 2 August 2017, I have now taken legal advice because it is such a important issue for ourselves. I would like to make the following additional comments:

The classification of the site in terms of the Traffic Light Model

1. The Code of Best Practice on Mobile Phone Network Development published by the Welsh Assembly Government in 2002 ('the Code') requires the applicant to outline, as part of the planning application, the rating assigned to the site under the Traffic Light Model. The Model assists in ascertaining the amount and type of public consultation that is required for any proposed site. In the document submitted with the application entitled 'Supplementary Information', it is clear that the applicant has assigned a Green rating to the site. It is not clear how the applicant arrived at that calculation. I have undertaken my own assessment of the proposal in relation to the Traffic Light Model (as set out below), and do not consider that the proposal should have been allocated a Green rating.
2. The Traffic Light Model uses a graph, which operates along two axes: 'Planning and Environmental issues' (horizontal) and 'Community issues' (vertical). The Planning and Environmental Issues axis is graded 0-30, where 0 indicates very low concern or no concern and 30 where there are likely to be major concerns. This axis is broken down into 3 sub categories: Sensitive Land Use, Siting and Appearance, and Planning. It is submitted that, as per the factors outlined in the Code for each sub category, in the 'Sensitive Land Use' category, the site would score highly, given the very close proximity of the mast to dwellings, particularly mine. I also consider that in the 'Siting and Appearance' category, the proposal would score highly because of the impact of the mast on the skyline, and on views of recognised importance (the site is adjacent to Gregynog (a Registered Park/Garden), and appearance (particularly the height of the mast) and the fact that this is a new site. The site would therefore score highly in the two most influential categories on this horizontal axis.
3. As to the vertical axis ('Community Issues'), it is submitted that the proposal would score highly in relation to the sub categories entitled 'Views and attitudes of Local communities', given the number of objections which have been submitted opposing the application; and the 'Social Political' sub category, given that Assembly Member Russell George has recently become involved in this application. There is a strong indication that a high score should be allocated in these sub categories and therefore this axis.
4. As such, I consider that the proposal overall should at the least have been allocated an Amber rating, and potentially a Red rating. Under the Code, if the site is rated Amber or Red, the operator should as a minimum send letters to the Community Council and Ward Councillors. A minimum period of fourteen days should be allowed for comments to be made on the proposals. In the letter, details of the preferred option, possible alternatives (if there are any) together with options

considered and rejected should be given. There are a number of additional consultation tasks outlined in the Code which could be undertaken depending on the characteristics of the site, including a letter mail shot, an informal drop in session, a key stakeholder briefing session, leaflets, and a public notice in the local press.

5. Because of the applicant's incorrect categorisation of the proposal, none of these consultation tasks have been undertaken. The correct procedure has not therefore been followed, and members of the community have potentially been prejudiced by this lack of consultation; for example, the consultation process could have elicited a more suitable alternative site from a consultee or a member of the community. The lack of the required level of consultation means that the application is procedurally flawed, thus giving grounds for challenging any planning permission in the High Court, with all of the cost implications that this would give rise to for the Council

#### Alternative sites

6. In my previous letter of objection I stated that it was clear that there had been no meaningful investigation of alternative sites for the mast. I would like to expand upon that point here.
7. The Code states that an application such as this should include details of alternative sites with a justification for rejecting them, and that "this should include existing masts, structures and other buildings within the search area". Paragraph 14.5.3 of the explanatory text to Policy DC4 of the Powys UDP states that operators should share existing sites, masts and structures in order to prevent a proliferation of installations, and that developers will be required to provide evidence of the consideration that they have given to the possibility of utilising shared facilities. Policy DC4 itself states that '[w]here feasible, proposals shall share the site or structure of an existing facility'. Paragraph 57 of TAN 19 (Telecommunications) states that '[l]ocal planning authorities may reasonably expect applications for new masts to show evidence that they have explored the possibility of erecting antennas on an existing building, mast or other structure', whilst paragraph 58 of TAN 19 states: "[i]f the evidence regarding the consideration of such alternative sites is not considered satisfactory, the planning authority, or the Assembly on appeal, may be justified in refusing planning permission for the development".
8. In the document entitled 'Supplementary Information', the applicant sets out 6 alternative sites which it says were considered and not chosen. The reasons why each site was deemed unsuitable by the Applicant are set out. It is submitted that the evidence regarding alternative sites is unsatisfactory for the following reasons:
  - i. The Code sets out which documents should be submitted with an application for planning permission. One of those is an O.S. base map highlighting all alternatives that have been considered. This should focus on existing masts and structures and include all alternatives. No such document has been submitted with the application.
  - ii. The Applicant's reasoning for rejecting the alternative sites identified is brief and lacks sufficient detail to evidence a full and proper assessment having been made.
  - iii. The third property listed, referred to as 'Land at Tregynon Telephone Exchange', is rejected by the Applicant, with the reasoning that it would '*adversely affect the amenity of adjacent residential dwellings*'; it is not at all clear therefore, why the site that is now proposed, being located within 9m of my property, which includes commercial and residential premises, and would indeed give rise to and adversely impact on the residential amenity of my property.
  - iv. In addition, there are a number of sites which would appear to present true alternatives, which are not included within the Applicant's assessment:

#### Greenfields, Tregynon

- a) In my previous letter, I identified an alternative site, being the land owned by Mr John Morris at Greenfields, Tregynon. This is the land referred to in a letter dated 3 February 2014 from Harlequin Group to Mr Morris (which letter was attached to my letter), in which the Harlequin Group identifies Mr Morris' land as potentially suitable for the siting of telecommunications equipment. The Harlequin Group, which has expertise in the

identification and acquisition of land for siting telecoms equipment, considered Mr Morris' site to be potentially suitable as recently as 2014, and there is no reason to suggest that their assessment would be different today.

- b) Mr Morris' site is far less sensitive than the proposed site because it is located much less closely to existing residential properties.
- c) On 12 September 2017 I met with the applicant's agent, Clarke Telecom, to discuss the application. At the meeting I suggested that Mr Morris' site might be more suitable than the proposed site for the above reasons. The applicants' agent verbally rejected my suggestion, out of hand, on the basis that Mr Morris's site is located 40m lower than the proposed site. I have since checked this with Mr Morris and we calculate that his site is only 7m lower than the proposed site.
- d) Accordingly it is clear that Mr Morris' site should have been fully and properly assessed as a viable and preferable alternative to the proposed site. Proper consideration should be given to Mr Morris' site in order to ascertain whether it is more suitable than the proposed site.

#### Land at Pwllan, Tregynon

- e) I am aware that Clarke Telecom is currently in the pre-planning application consultations phase in relation to the introduction of another mast in Tregynon. This mast is intended to serve the Home Office led Emergency Services Mobile Communications Programme, which aims to provide critical voice and broadband data communications service for the 3 Emergency Services. The new service, called the Emergency Services Network (ESN), requires the installation of a mast.
- f) I understand that Clarke Telecom have considered various sites for the placing of this mast, and that their preferred site is on land at Pwllan, Tregynon ('the Pwllan site').
- g) Given that the Pwllan site is considered by Clarke Telecom to be suitable for the ESN mast, it would likely also be suitable for the applicant's mast.
- h) Paragraph 125 of the Code states that '[i]t has been a Welsh Assembly Government policy objective to encourage telecommunications operators, wherever practicable, to share masts and sites as a means of reducing overall mast numbers'. It is clearly the intention of the Council and the Welsh Assembly Government that masts are shared, or that single sites share multiple masts.
- i) The Pwllan site would be more suitable to accommodate a shared mast/two masts than the land adjacent to my property; for example, the Pwllan site is located further away from residential properties, and a mast in this location would give rise to be a less likely to have a detrimental impact on views in the local area as compared with the current site. It would seem to be a far more sensible option and one which is clearly supported by policy. Given that Clarke Telecom is the agent which is dealing with the applicant's proposal and the ESN mast, a sensible solution would be to require the applicant to undertake an assessment of the Pwllan site to ascertain if it could accommodate both masts.

#### Ty'n Y Bryn

- j) No evidence has been submitted which shows that consideration has been given to alternative sites already owned by the landowner of the current site (Mrs Jean Gethin Jones, Ty'n Y Bryn Farms). There are an abundance of large agricultural buildings at Ty'n Y Bryn which should have been considered as preferable alternatives to the new site which is currently proposed.

9. It is submitted that the selection and review of alternative sites undertaken by the applicant does not come close to satisfying the requirements of the Code, or local or national policies. No justification has been given for why the alternative sites outlined in the 'Supplementary Information' document were chosen. There is insufficient detail about each of the alternative sites. The range of sites considered by the applicant is insufficient and lacking, and excludes other potentially more suitable sites. The Council is urged to reject the application on this basis, pursuant to TAN 19.

#### Assessment of Impact on Amenity

10. Policy DC4 of the Powys UDP states that applications for masts will be approved provided that the development would not be significantly detrimental to the amenities enjoyed by existing or proposed properties, such as noise or visual impact.

11.As to noise, it is not clear from the information submitted by the Applicant whether the mast will produce noise; clarification should therefore be sought in this regard from the Applicant. If noise is to be produced, the Council should require an acoustic report to be produced (as per paragraph 90 of the Code) given that the mast will be located close to residential properties and particularly close to mine.

12.As to visual impact, I consider that the proposal will be significantly detrimental to the amenity of my property in terms of visual impact, and therefore in conflict with Policy DC4. The Applicant has not submitted any formal assessment of visual impact. In the document entitled 'Planning Statement', which was submitted with the application, the applicant briefly summarises the location and context of the proposal, as well as siting and design considerations, but no proper assessment has been undertaken. The Council should require that the applicant provide a formal visual impact assessment, by a qualified person, which fully assesses the impact that the mast will have. Without a proper appraisal, the Council cannot make a proper assessment as to whether the proposal complies with policy in this regard.

In conclusion therefore, it is apparent that the application is lacking in a number of key areas, which failings would present grounds for Judicial Review of any planning permission granted. It would seem overtly sensible in any event, to withhold any decision in relation to this application pending further progress in relation to the Pwllan Site scheme, as it would be premature to proceed without first having properly considered the possibility of combining the two proposals at the Pwllan Site.

---

Yours Sincerely

Noel Owen.



## HEALTH AND MOBILE PHONE BASE STATIONS

We recognise that the growth in mobile technology has led, in some cases, to public concern about perceived health effects of mobile technology and its deployment, in particular about siting masts close to local communities. Quite naturally, the public seeks reassurance that masts are not in any way harmful or dangerous.

We are committed to providing the latest independent peer-reviewed research findings, information, advice and guidance from national and international agencies on radiofrequency (RF) electromagnetic fields.

Vodafone and Telefónica ensure that our radio base stations are designed, built and operated so that the public are not exposed to radio frequency fields above the guidelines set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP). In fact, radio base stations operate at low power and emit low levels of radiofrequency fields, typically hundreds of times lower than the ICNIRP general public guidelines.

### Research Reviews

The World Health Organisation notes that *“In the area of biological effects and medical applications of non-ionizing radiation approximately 25,000 articles have been published over the past 30 years. Despite the feeling of some people that more research needs to be done, scientific knowledge in this area is now more extensive than for most chemicals (<http://www.who.int/peh-emf/about/WhatisEMF/en/index1.html>).* The scientific community have collated, summarised and assessed these publications into research reviews. The most influential in the UK being the Mobile Phones and Health Report (also known as the Stewart Report) by the Independent Expert Group on Mobile Phones under the chairmanship of Professor Sir William Stewart. These research reviews are used by Governments to develop policy on exposure to radiofrequency signals.

The Stewart Report concluded that the balance of evidence did not suggest that exposures to radio frequency fields below international guidelines could cause adverse health effects, although it is acknowledged that biological effects might occur below these values. The report stressed, however, that a biological effect does not necessarily mean a negative impact on health. Walking, drinking a glass of water or listening to music all produce biological effects. One of the recommendations of the Stewart report was a research programme to address uncertainties regarding mobile phone base stations and health. This programme was called the Mobile Telecommunications and Health Research (MTHR) Programme. The final report from this programme was published in February 2014. The report noted that the research conducted found no evidence of biological or adverse health effects from the radio waves produced by mobile phones or their base stations.

Since the Stewart Report, over 30 further reviews have been carried out, carefully considering many hundreds of pieces of research. Most have made similar recommendations and have come to similar conclusions: that research should continue to address any gaps in the knowledge; and that overall, the possibility of adverse health effects from mobile communications remains unproven.

In April 2012 the Health Protection Agency’s independent Advisory Group on Non-ionising Radiation (AGNIR) published a report entitled “Health Effects from Radiofrequency Electromagnetic Fields”. This report concluded that there is no convincing evidence that mobile phone technologies cause adverse effects on human health.

The World Health Organisation (WHO) noted that *“A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use”* WHO factsheet 193: Electromagnetic fields and public health: mobile telephones, 2014.

## **Compliance with International Exposure Guidelines**

All Vodafone and Telefónica installations are designed, constructed and operated in compliance with the precautionary ICNIRP public exposure guidelines as adopted in EU Council Recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz). These guidelines have been set following a thorough review of the science and take into consideration both thermal and non-thermal effects. They protect all members of the public 24 hours a day. In addition, precautionary measures have been taken into account when setting relevant guideline limits for the public (i.e. in the UK a safety factor of 50 times is applied to the public exposure guideline).

When measured, field strengths are typically hundreds of times lower than the precautionary ICNIRP general public guidelines.

An ICNIRP certificate is provided with every planning application and this verifies that the mobile phone base station, when operational, will meet the precautionary ICNIRP guidelines. We also provide further documentation to clarify that the ICNIRP certificate addresses emissions from all mobile phone network operators' equipment at the proposed site.

## **ICNIRP Guidelines**

The radiofrequency public exposure limits for EMF fields were developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) <http://www.icnirp.org> following evaluation of all the peer-reviewed scientific literature, including thermal and non-thermal effects. ICNIRP is a non-governmental organisation formally recognised by WHO. Established biological and health effects have been used as the basis for the ICNIRP exposure restrictions. The ICNIRP guidelines have been adopted for use in the European Union and the UK.

In August 2009, ICNIRP published a review of the guidelines for limiting RF exposure and concluded that *"it is the opinion of ICNIRP that the scientific literature published since the 1998 guidelines has provided no evidence of any adverse effects below the basic restrictions and does not necessitate an immediate revision of its guidance on limiting exposure to high frequency electromagnetic fields."*

### **Further Information:**

**World Health Organisation EMF Project** - <http://www.who.int/peh-emf/en/>

**International Commission on Non-Ionizing Radiation Protection (ICNIRP\_**

<http://www.icnirp.org/>

**Public Health England (formally HPA)**

<https://www.gov.uk/government/collections/electromagnetic-fields>

### **Or contact:**

EMF Enquiries, CTIL

The Exchange, Arlington Business Park, Theale, Berks, RG7 4SA

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Dunya Fourie  
Planning Officer  
Powys County Council  
The Gwalia  
Ithon Road  
Llandrindod Wells  
LD1 6AA

Our Ref: TEF 51021/LPA.LTT2/AJS  
Your Ref: P/2017/0708

11 October 2017

Dear Dunya

**RE: P/2017/0708 – LAND AT TY’N Y BRYN FARM, TREGYNON – PROPOSED TELECOMMUNICAITONS INSTALLATION**

I refer to our telephone conversation on 28 September regarding the above application for planning permission. Apologies for the delayed response but unfortunately, I have been absent from work for much of the last two weeks due to illness.

As discussed, I am writing to update you on a number of issues raised following a recent meeting held between my Client and the main objectors to the proposal, namely local residents Peter Harris, Paul Harris and Noel Owen; the MD of Neo Fabrication. The meeting took place on 12 September at Newtown Football Club and was also attended by Councillor Heulwen Hulme and Russell George, Assembly Member for Montgomeryshire.

At the meeting, three alternative options to the proposed application site were suggested by the objectors. As these sites did not form part of the discounted options presented within the submitted application we agreed to investigate them further. The sites are as follows, the specific locations of which are noted within Figure 1 at the foot of this letter.

**1. Land at Pwllan Farm, Tregynon – E310014 N296504**

This site is located on elevated ground to the east of Tregynon. The site has been earmarked as a potential option for a new mast to provide coverage for the new Emergency Services Network (“ESN”) on behalf of the Home Office and its contractual partner, EE Limited (“EE”).

It must be stressed that this site is however very much in its early stages and, as I understand it, terms for lease are currently being discussed with the landowner. Planning permission has not yet been sought by the Home Office’s retained agents. Indeed, nothing is known of whether the option would be a shareable structure or if the Home Office would even permit this, but given the current status of this proposal this is probably a moot point.

Moreover, it must be said that the coverage requirements of Telefónica are simply not comparable to those of the Home Office. Telefónica are striving to provide as much coverage as they can across the rural communities of Tregynon and Bettws Cedewain; coverage levels which have been clearly illustrated within the previously submitted plots.

The Home Office's principal concern is for road coverage which is vital to the operation of the police and other emergency services, whom will migrate across from the existing Airwave network in the coming years.

Telefónica have a completely different network configuration to this new public safety network, with specific commitments to its customers and also those of the communications regulator, Ofcom, through its licence obligations. All this ensures that what may be viable for the Home Office and EE in terms of coverage is not always viable for Telefónica.

Whilst the option at Pwllan Farm, would clearly provide good levels of coverage to the village of Tregynon, it would not provide the same levels of coverage to the village of Bettws Cedewain due to intervening topography and increased distance.

The current application site is positioned so that coverage to a significant area will be maximised, achieved through a relatively modest height proposal, adjacent to a long established industrial land use, which will, taken by itself, have a limited visual impact on its wider setting.

## **2. Red House Farm, Tregynon – E310921 N298260**

At the meeting, Councillor Hulme requested consideration be given to a further potential option to the south east of Tregynon, which we have also agreed to consider further. It was however clear that the site, for the most part, was simply chosen as it was distant from the current application site and occupied an elevated position in the landscape.

The site was later established to be within the ownership of Red House Farm. Despite several attempts, no contact has been made with the landlord of the property, to confirm their willingness or otherwise to accommodate such an installation.

The proposed location is atop an exposed hillside with very little opportunity for natural screening. Access to the site is not straightforward and the closest power supply is at some considerable distance from the site. The required provision for a fibre transmission cable is even more problematic.

Whilst coverage from the site would certainly meet Telefónica's requirements, the potential increased cost implications of providing power and transmission to this more remote location, with little commercial gain in servicing this low population area, would render the proposal unfeasible.

This would result in the two villages and the surrounding area missing out on the opportunity for modern network service provision. In other circumstances, Telefónica may have been capable of absorbing this significant additional cost but it is not considered feasible here, particularly when we feel we have an entirely appropriately sensitive and suitable alternative location.

Moreover, feasibility and lack of interest from the landowner aside, given the open and exposed nature of the site, and the landscape impact implications of that, it is maintained that the current application site is significantly more appropriate in planning and visual impact terms.

### **3. Greenfields, Tregynon – E310076 N296670**

The area around Greenfields is undulating but the ground height drops between 15m and 40m from the ground height of the current proposal. This would mean we could not service the area to the north without a significantly taller mast to compensate for such an appreciable drop in elevation. This would require a much taller, bulkier mast at this location, which would create a much greater impact upon the landscape, while providing a significant reduction in effective coverage within the main target area of Tregynon.

These issues would be exacerbated further by the increased distance from Tregynon. This option is a further 500m south, meaning that the coverage footprint would move a further 500m south with that. This would lead to a severely compromised service in Tregynon and has therefore been discounted on technical grounds.

### **Concluding Comments**

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In summary, we maintain that the current application site is the most appropriate solution, both technically and in planning and impact terms. Its proposed siting adjacent to an established industrial land use is wholly appropriate and any impacts will be diminished by the substantial screening which abuts the application site.

The new design of structure to that of a coloured monopole will also assist in limiting visual impact and has been welcomed by the local planning authority.

We have demonstrated that the proposal will provide extensive levels of coverage to the surrounding rural communities leading to significant economic and social benefits to both the local and visiting population.

We would be happy to provide any further supporting information at this stage.

Yours sincerely

James Scholfield

**Planning Consultant**

For and on behalf of CTIL and Telefónica UK Limited

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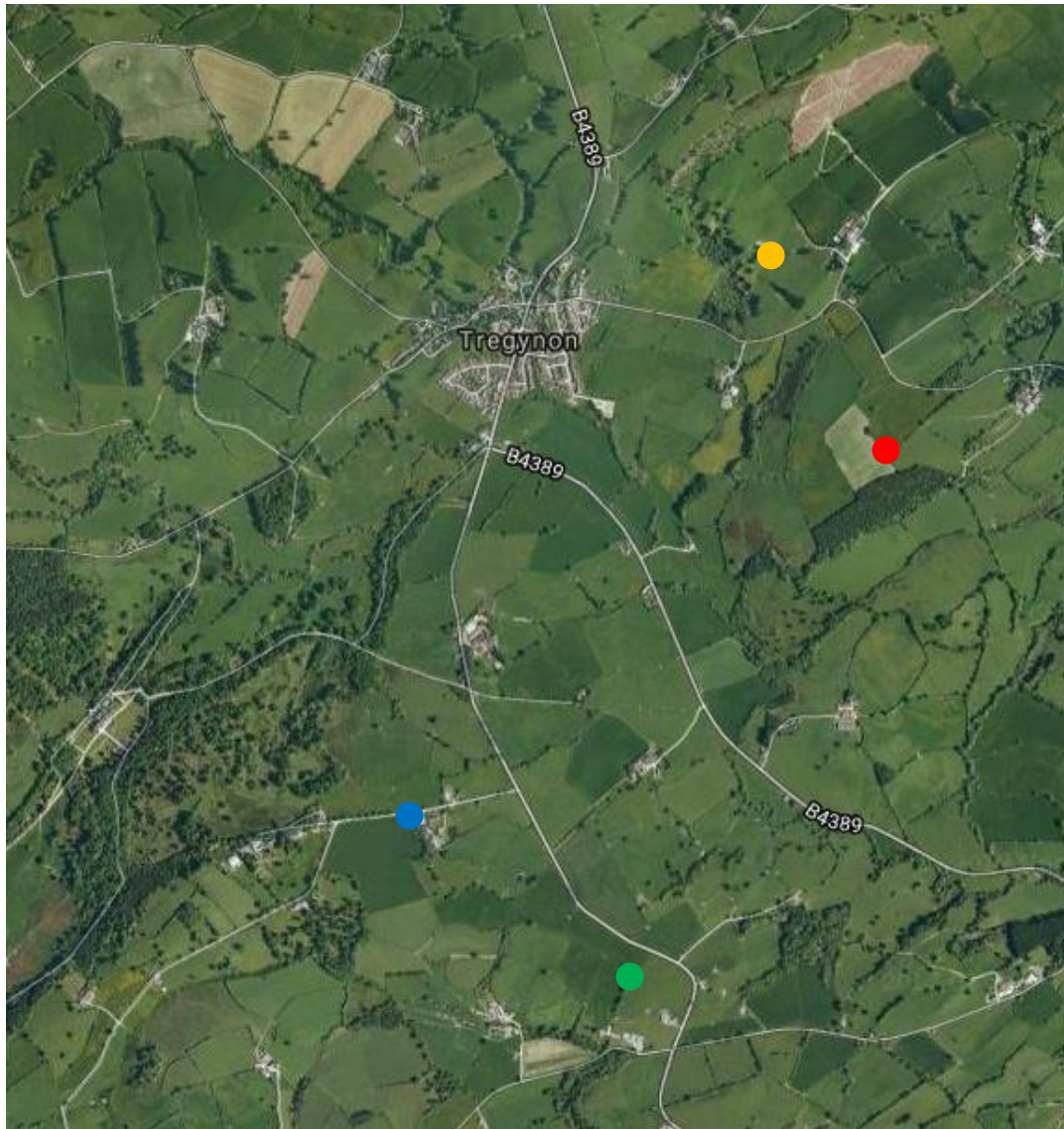


Figure 1

- 1. Pwllan Farm
- 2. Red House Farm
- 3. Greenfields
- 4. Ty'n y Bryn (application site)