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14th February 2005
Our Ref: RP/73095

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RECORDED DELIVERY

FAO Mr S. Holder

Dear Sir

PROPOSED TELECOMMUNICATIONS INSTALLATION ON BEHALF OF T-MOBILE UK LIMITED CONSISTING OF A 17.5 SLIMLINE LATTICE TOWER, THREE ANTENNA, ONE DISH AND GROUND BASED CABINETS WITHIN A FENCED COMPOUND AT CHASE WOODS, OFF FERNBANK ROAD, ROSS-ON-WYE

Further to the informal correspondence with the Council and a previous planning application which we withdraw because of concerns about it affecting the route of a public footpath in respect of an alternative site at Fernbank Road, please find enclosed a full planning application in this respect.

Requirements for the proposal

T-Mobile UK Limited provides an electronic communications network authorised under the provisions of the Communications Act 2003 and is a company to whom the electronic communications code applies under section 106 of the Communications Act 2003.

The proposed installation is required in connection with the provision of coverage to the central and southern areas of Ross-on-Wye. Thus it will provide in-building coverage to residential and commercial properties as well as in-car coverage to the local road network. This is increasingly important where there is a growing reliance by both businesses and householders on mobile technology, as many people prefer to use mobiles rather than landlines even when in the office or home.

Enclosed are a set of coverage plots which show the existing and predicted levels of mobile phone service in the area. These plots clearly indicate the extent of the unsatisfactory situation of coverage in this area at the present time, the predicted improvements post-development and how the current proposal will form an integral part of the operator's network, demonstrating that there is a need for an installation in this area.



Andrew Wilkes & Associates Limited
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Visual amenity

This site has been selected because it is considered that the location affords the best coverage possible whilst having a minimal impact on the character and appearance of the surrounding area.

The site selected next is off a private track serving the Forestry Commission's land. Hill Farm is located to the north-east beyond the trees. The proposed mast will in effect be sited within a group of mature trees of about 16m in height and therefore it and the fenced compound will be well screened from view from outside the woodland. These trees will afford some excellent screening of the mast when viewed from all directions including the lower land to the north-west, which is the direction of the southern part of Ross-on-Wye, with only a very small portion protruding above the neighbouring trees. Furthermore, with regards to ground level perspective, these trees around it (360 degrees) will also act as an effective screen and backdrop especially when viewed from closer quarters. Whilst the 17.5m height will allow for the antenna (each about 1.4m high) to be just above the ambient tree line, in order to work effectively and provide the necessary coverage, the close location of the trees will mean that it will ensure that it does not stand isolated on the skyline. The land rises to the south and so the mast will not be at the pinnacle of the hill. In addition there are a number of taller trees set within this woodland that appear higher than the ambient canopy height. Furthermore, with no bulky head-frame attached (the antenna's and dish will be attached directly to the latticework of the tower), it will not appear overbearing and so particularly noticeable in the context of the landscape. I have attached a photomontage taken from Ross-on-Wye looking south-east towards the hill. This shows the height of the mast in context with the trees (in Winter). It is argued that most of the mast will be well hidden whilst the top exposed portion would not protrude above the ambient tree canopy to any great degree and certainly similar to the occasional higher tree protruding above this ambient height.

The slimline lattice tower has been selected as it is considered that this type of design is the least obtrusive type of telecommunications mast, particularly where, as in this case, there is no bulky headframe, in that it allows some permeability of the background through the structure, reducing its overall impact. Furthermore, the open lattice work of the mast is considered the best design when located close to trees as, due to the open nature of the latticework, it readily blends in with the numerous , branches and twigs of the adjacent trees, thus minimising its impact in the landscape whereas a more solid structure such as a monopole, would stand out. Thus such a structure would be particularly unobtrusive in the context of its particular setting.

Also, the slimline lattice design is capable of being shared (subject to obtaining separate planning permission because it is in an AONB). In addition the lattice mast could be painted an appropriate colour to your choice if you felt it to improve upon its appearance. The galvanised grey finish/colour of the mast and equipment though, is considered to be particularly discrete when set within the shadows created by the trees.

It is also appreciated that the site lies within an AONB and that such designations are important in protecting sensitive areas. However, the fact that land lies within such an area is not in itself sufficient reason for not allowing telecommunications development. This is particularly the case where it can be demonstrated that there are very special circumstances to outweigh a presumption against inappropriate development such as the need to set up an effective and comprehensive telecommunications network. Account has to be taken of the operational need for a particular installation and where, as in this case, it is considered that the siting and design of the proposal is the best that can be achieved in an area it is considered that the benefit derived from the proposal should outweigh any limited visual harm caused. Any view of it, would only be glimpses and in any event it would not be over bearing or demonstrably harmful to the visual amenities of the area.

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The preferred site is also well away from any known school. The nearest residential property is at Hill Farm beyond the trees to the north-west.

Alternative site search

As you appreciate, there have been extensive investigations into numerous alternative sites in this area in order to provide the coverage to the target area/cell. The alternative sites considered are described in detail below and also summarised in the accompanying supplementary information. This includes a recent planning application we submitted in August 2004 for a site closer to the town (Ref: DCSE2004/2862/F refers). However, it subsequently transpired that the site would be on or too close to a public footpath and relocating it would have resulted in more visual impact upon nearby housing. Hence it was withdrawn and a new search instigated resulting in this current preferred proposal.

Among the sites considered were the following:

- **Land at Fernbank Road, Ross-on-Wye** – This proposal was subject to a recent planning application submitted in August 2004 (Ref:DCSE2004/2862/F). It was subsequently withdrawn because the site was affected by a public footpath and alternative locations in this area would have resulted in greater visual impact.
- **T-Mobile Mast, Cattle Market, Ross-on-Wye.** There is an existing 15m lattice mast here, which, unfortunately, although providing good coverage to a section of the main road, is some 5m below the level of that road and does not 'see' over the properties in the vicinity into the main part of the town. It has been assessed that in order to provide the required coverage from this site it would be necessary to extend the mast by at least 10m. The Local Planning Authority indicated that this would not be acceptable to them.
- **Hildersley Farm, Ross-on-Wye** Planning permission has been granted for commercial development here, and this was the preferred option of the Local Planning Authority. However, due to the topography of the land, which results in a higher ridge between the site and the southern part of the town, the signal would not extend to that area, leaving a section without coverage and a much greater part of the town with an inadequate 'on-street' only service. A coverage plot (ref:26998) is enclosed that illustrates this.
- **Arbour Hill, Ross-on-Wye** This site is much more exposed than the current proposal and, whilst it may be possible to locate a modest mast such as a 'telegraph pole' without undue visual intrusion, the height that would be acceptable in these terms would not provide the required coverage to the target area.
- **Orange PCS Rooftop Installation, John Kyrle High School, Ross-on-Wye.** The existing stub tower would need to be redeveloped with a larger structure in order to accommodate additional equipment, which it is felt would increase its visual intrusion. Furthermore, it was not felt to be worthwhile pursuing this option as the school's policy towards allowing telecommunications equipment has changed since the time of the original installation and permission for another operator would not be forthcoming.
- **Airwave Installation, Police Station, Ross-on-Wye.** Again it would be necessary to redevelop the existing installation in order to accommodate another operator's equipment. The site is within a Conservation Area and the resultant structure would be highly prominent and likely to be more visually detrimental than the preferred option.
- **NTL Installation at Lapurrez Community Centre, Ross-on-Wye.** This tower is already shared by O2 and Vodafone and is at full load capacity and would therefore require redevelopment in order to accommodate further equipment. Ground space for additional equipment cabinets is also restricted. In addition, the Local Planning Authority advised that this site would be likely to be contentious.
- **O2 Installation at Reservoir, Ross-on-Wye.** This landowner has advised that they will not allow a site share in this case.

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- **Broadmeadows Industrial Estate.** It is understood that a planning application submitted by H3G in respect of this site was refused by the Council due to environmental concerns in respect of flooding. It does not appear that a further application in this location would be any more acceptable.
- In addition to the above sites, it was suggested by a Ward Councillor, in response to pre-application consultation, that a site on top of the hill, above the woods, would be more appropriate. However, the landowner was not willing to allow telecommunications equipment on their land.

The current proposal was therefore selected as being the best available in terms of its siting and appearance and the level of coverage that could be achieved. The design of the proposed mast equipment is as unobtrusive as possible and it is therefore considered that the proposal is in accordance with both central and local government policies and guidance.

Publicity

You are probably aware that the telecommunications industry has adopted the 'ten commitments' to ensure that the site selection process takes into consideration the need to consult interested parties prior to the submission of formal proposals. This involves using a 'traffic light model' to assess the extent of publicity required.

In this case the site is set a good distance from sensitive locations, such as schools and nurseries but its location is in the AONB. On balance it was therefore felt that a 'amber' rating was appropriate and the LPA and Ward Councillors were consulted prior to the submission of this application. No written response on the specific site was received.

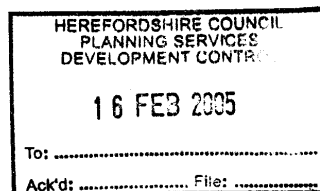
Policy

It is appreciated that the site lies within the AONB and that such designations are important in protecting sensitive areas. However, the fact that a site lies within such an area is not in itself a sufficient reason for not allowing telecommunications development, particularly where, as in this case, there are very special circumstances sufficient to outweigh any presumption against development. It has been accepted in previous appeal decisions that the need to set up an effective and comprehensive telecommunications network amounts to these special circumstances. Furthermore, it can be argued that the proposed telecommunication installation will be beneficial to the rural economy in the area, as the installation will also provide coverage to local business, the local tourist industry and the road network as well as residential users. To this end it would meet the requirement of the local plan policy and the advice in PPG7.

Account has to be taken of the operational need for a particular installation and where, as in this case, it is considered that the siting and design of the proposal is the best that can be achieved in an area, particularly the benefits of using a tall building and its present appearance, it is considered that the benefit derived from the proposal should outweigh any limited visual harm caused. It has been demonstrated that there is a definite need for this installation in order to provide coverage to this particular cell for the benefit of local residents and businesses and the transport network. It will therefore meet a social as well as economic need for the local community as well as visitors.

Health

Recent Government advice set out in PPG8, in response to the precautionary approach suggested by the Stewart Report, advises that all installations should meet ICNIRP guidelines for limiting exposure to electromagnetic fields. If such assurance is given, the Local Planning Authority should not need to consider the health effects further. A statement to this effect is included with the application.



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Conclusion

It is felt therefore that, given the technical constraints and the characteristics of the area, the site that has been chosen provides the best solution to the network requirements of my Client in this area without unduly or adversely affecting the character and appearance of the area. It is therefore in accordance with both national and local policies for acceptable telecommunications development.

I hope that this provides sufficient information to enable a favourable recommendation to be made in regard to the siting and appearance of the installation but please do not hesitate to contact me if you require any further details or wish to discuss the matter further.

Yours faithfully



Richard Palmer MRTPI
Planning Consultant for AWA Ltd
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1. Plans indicating proposed siting and appearance
2. Supplementary supporting information
3. Application forms and ownership certificates.
4. Coverage plots
5. Cheque for £220.
6. ICNIRP Statement.
7. Photo montages

