

Our ref: MIP-SWA3014  
Contact: Katie Yeoman  
Email: [planning@harlequin-group.com](mailto:planning@harlequin-group.com)



Mrs Sam Caswell  
Penrice Community Council  
762 Gower Road  
Upper Killay  
Swansea  
SA2 7HQ

**Via Email**

12<sup>th</sup> January 2015

Dear Mrs Sam Caswell,

**Re: The Mobile Infrastructure Project  
Pre application Consultation with Penrice Community Council:**

**Proposed installation of 22.5 High Lattice Tower Mobile Phone Base at land at  
Beeches Farm, Horton, Swansea, SA3 1LW**

**NGR: 247620 186550**

I write on behalf of Arqiva Services Ltd who propose to develop a shared electronic communications base station at the above site as part of the Government's Mobile Infrastructure Project (MIP), a publicly funded initiative that seeks to remove 'not-spots' in rural areas where no mobile phone coverage is currently non-existent. The MIP project is state funded as it is to correct a market failure in the supply of mobile coverage.

The purpose of this letter is to invite your comments on this proposal so that they can be taken into account in finalising the detailed design of the development. The alternative site discounted options considered in our site selection process are also briefly discussed, including an explanation of the reasons why they are not being progressed. The Traffic Light Rating assessment for this site is discussed and the associated consultation strategy proposed is set out, I would like your view on this.

**The Proposal**

You may recall from the information previously sent to the Local Planning Authority that Arqiva has been selected by the Government's Department for Culture, Media and Sport to deliver the MIP. The MIP, which forms part of the Government's National Infrastructure Plan, provides £150 million to build base station infrastructure that will deliver coverage improvements to selected not spots. This funding has to be spent by the end of March 2015, providing a one-off opportunity to address the disadvantages affecting communities without access to mobile coverage. If this opportunity is missed, the ability to eradicate the not-spot in this area will be lost, in all probability forever, further compounding the rural economy and divide.

Harlequin Group • Innovation Centre • Maidstone Road • Chatham • ME14 2TA  
T: 01634 683635 F: 01634 661550 E: [planning@harlequin-group.com](mailto:planning@harlequin-group.com)

Offices: Livingston (Scotland), N. Ireland, Chatham (Kent) • Directors: David Summers BSc (Hons) MRICS, Andrew Wood, Russell Frith BSc (Hons)  
Harlequin Ltd t/a Harlequin Group registered in England and Wales • Registered Number: 2836322 • Registered Office: Innovation Centre • Maidstone Road • Chatham • Kent ME5 9FD

[www.harlequin-group.com](http://www.harlequin-group.com)



In this case, the proposal involves the development of a shared base station which would remove a number of not-spot areas in and around the area. The structure must be located within a specific area in order to provide an acceptable level of coverage and remove these not-spots. It is proposed to develop a shared base station comprising:

- A 22.5m high lattice tower
- Six antennas and two 0.6m diameter dishes attached to the tower
- Six equipment cabinets at ground level
- A compound secured by fencing
- A small new access track

The line of site transmission link has been proven to link the site back into both MBNL (EE (T-Mobile and Orange) and 3) and CTIL (Vodafone and O2) phone networks. The line of sight trials indicate that the lowest height the structure could be at this location would be 22.5m in order to gain point to point transmission links and whilst providing the desired level of coverage to the 'Not Spots'.

### Alternative Sites Considered

The proposal site has been selected following a comprehensive search of a number of locations for the development of a base station to provide coverage to the local area. A full summary of the sites considered and the reasons for discounting is given below.

In brief, due to limited nature of the search area and the target to cover the maximum amount of 'not spot' areas, the proposed site provides the most suitable location taking into consideration the available screening and with the lowest height structure.

Other alternative sites were assessed as not being preferable or as an available location for the base station. This was due various factors such as the failure of a site to provide an acceptable level of coverage to remove the not-spots, landownership restrictions, town and country planning constraints (higher structures, more intrusive, less available screening etc), or technical and operational factors.

<b>Discounted option no.</b>	<b>Location</b>	<b>Justification</b>
<b>1</b>	Little Hills Farm	We were unable to ascertain the site provider's interest in accommodating an installation on their land, as such this option was discounted.
<b>2</b>	Bank Farm Caravan Park	We were unable to ascertain the site provider's interest in accommodating an installation on their land, as such this option was discounted.
<b>3</b>	Western Slade Farm	This option is located on low lying land (66m ASL) and in an area of dense woodland, as such a structure here will not be able to achieve the

		necessary coverage to not spot premises. This option was discounted as a result.
<b>4</b>	Land North of Caravan Park	Due to the gradient of the land leading to the village of Horton, a site at this location is unlikely to be able to provide the necessary coverage to the not spot premises. This option was discounted as a result.
<b>5</b>	Caravan Park	This option is close to the residential area of Horton and a structure here is likely to be visible from a number of properties. Additionally, this option is close to the Horton and Port Eynon Conservation Areas and the Heritage coastline. This option was discounted due to its potential visual impact on the surrounding areas.
<b>6</b>	Moor Corner Farm	This option is located away from the village of Horton and, due to the gradient of the land, would not provide the necessary coverage to not spot premises. Additionally, there is limited screening available at this site, meaning that an installation here would be visible on the horizon. For these reasons, this option was discounted.
<b>7</b>	Land to north Western Slade Farm	This option was discounted as it is located outside of the search area so it would be unlikely to be able to provide the necessary coverage to not spot premises. Additionally, there is little screening available, increasing the potential visual impact of the structure. As a result, this option was discounted.
<b>8</b>	Port Eynon Holiday Park	This option was discounted due to its location adjacent to the Port Eynon Holiday Park and its proximity to the residential areas of Port Eynon and Horton. A structure at this location would be visible from a number of residential properties and from within the holiday park. Additionally, the site would be close to the Port Eynon Conservation area and within 500m of the Gower Coast SSSI and Limestone Coast SAC. This option was discounted due its potential visual impact on the surrounding areas.
<b>9</b>	Existing MBNL Site	This option was discounted as it would be unable to provide the necessary coverage to the not spot premises.
<b>10</b>	Land at Horton Farm	This option is adjacent to the Horton Farm Caravan Park. A structure at this location would be highly visible from the Holiday Park, causing a higher visual impact on the area.

11	Horton Farm	There are potential complications regarding power and access at this location and as such this option was discounted for operational reasons.
12	Land at Beeches Farm	This option is opposite the Horton Farm Caravan Park. A structure at this location would be highly visible from the Holiday Park, causing a higher visual impact on the area.



**Map showing discounted options (red) and proposed option (green)**

The proposal site is therefore considered the most suitable location for the development covering the maximum number of not spot areas whilst minimising any environmental impact, as far as practicable.

### **Other Consultations**

In accordance with best practice guidelines and the advice contained in the National Planning Policy Framework, Arqiva and Harlequin Group are committed to undertaking consultation with a range of organisations who may be interested in the MIP. Consultations undertaken to date include the information circulated following the MIP stakeholder conference held in June 2013. A further information letter was sent on 10 October 2013 setting out progress on the project.

Arqiva and Harlequin Group are keen to undertake an appropriate level of consultation for the proposal site. The site has been assessed using the Traffic Light Rating contained in the revised Code of Best Practice on Mobile Phone Network Development. The proposal has been categorised as amber. This rating has been attained as the proposed development would be located within an area of high landscape sensitivity, within the Gower AONB. Further, the

topography is relatively flat and undulating and benefits from limited natural screening therefore will be visible in long distance views. However, the choice of lattice design would assist in mitigating this visual impact, allowing views through the installation to the backdrop of trees and sky.

Considering this score, we propose to consult with Local Planning Authority, Penrice Community Council, Ward Councillor Lewis, the AONB Unit and Gower Broadband Community Group prior to the submission of a full planning application. If however, you feel the rating to be incorrect or consider that other interested parties such as local schools or community groups should be notified at this stage, then please pass on the contact details as soon as possible.

We would also like to take this opportunity to extend an invitation to organise a community consultation event to give the community an opportunity to ask questions about the proposed development and its location, to make suggestions, to view plans and see photographs of similar installations. Should you consider this to be beneficial, then please let me know at your earliest convenience.

Having read the details of this proposal and the accompanying information, if you wish to comment I ask that you do so within 14 days of the date of this letter. This will enable your comments to be considered prior to making a formal submission.

It is requested that should you have any comments, they be sent by e-mail rather than letter to: [planning@harlequin-group.com](mailto:planning@harlequin-group.com). In the meanwhile if you have any queries please call at your earliest opportunity to discuss.

Yours faithfully

Katie Yeoman  
Town Planner  
Harlequin Group

*M - 07854 377 802*  
*DD - 01634 661 556*  
Planning@harlequin-group.com

(for and on behalf of Arqiva Services Ltd as a duly authorised agent)