

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Wrexham Road	Site Address:	Pavement on Wrexham Road, Rhosllanerchrugog, Johnstown, Wrexham, LL14 1PA
National Grid Reference:	E: 330206, N: 346795		
Site Ref Number:	CS30800100	Site Type: ¹	Streetworks monopole

2. Pre Application Check List

Site Selection (for New Sites only)

(Would not generally apply to upgrades/alterations to existing site including redevelopment or replacement of an existing site to facilitate an upgrade or sharing with another operator)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?		No
If no explain why: After a previous consultation with the LPA, it was felt that the industry database was a more up-to-date source of information.		
Were industry site databases checked for suitable sites by the operator:	Yes	
If no explain why:		

Site Specific Pre-application consultation with local planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	
Name of contact:	

¹ Macro or Micro

In the first instance, all correspondence should be directed to the agent.

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Registered Address:

Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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1530 Arlington Business Park,
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Summary of outcome/Main issues raised:

A pre-application consultation letter, copy of the site location plan, proposed monopole design and a consultation plan were sent to the Local Planning Authority by email on 21/12/2023.

A reply was received dated 26/01/2024, advising *'With the proposed application I would advise that a full assessment of the impact on the adjoining hedgerow given the proximity. This should include an assessment of impact of the installation works and the long term impact on the health of the hedgerow. Given the proximity of the nearby pylons you may also wish to consider submitting a photo montage including this feature to illustrate the height of the mast in relation to nearby features.'*

The arboriculture survey to assess the impact on the hedgerow has been instructed at the date of submission and will follow as soon as possible.

Annual area wide information to planning authority

Has annual area wide information been provided?	No
If no explain why:	
Summary issues raised: Cornerstones commercial relationship with Vodafone has changed, effectively increasing our independence to work with other companies in the deployment of mobile infrastructure. It means we no longer have visibility of Vodafone full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. We aim to engage and work with the planning department at the earliest opportunity from when we are instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss our wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.	

Community Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
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Outline of consultation carried out: Prior to the submission of this application, the applicant initiates pre-consultation discussions with the local planning authority, Ken Skates MSs - Ken.Skates@senedd.wales, Simon Baynes MP - simon.baynes.mp@parliament.uk and Councillor Paul Pemberton - paul.pemberton@wrexham.gov.uk. This provides an opportunity for the LPA to discuss development proposals and identify site-specific issues, as well as the local MP and Councillors being informed of the proposal.
Summary of outcome/main issues raised (include copies of relevant correspondence): No specific comments received to date.

School/College

Location of site in relation to school/college (include name of school/college): None within close proximity.
Outline of consultation carried out with school/college (include evidence of consultation): NA
Summary of outcome/main issues raised (include copies of main correspondence): NA

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (only required for an application for prior approval)

Will the structure be within 3km of an aerodrome or airfield?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		No
Details of response: NA		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	08/03/2024	

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3. Proposed Development

The proposed site: WHP Telecom Limited act on behalf of Cornerstone. The proposal is to install a radio base station, in order to provide the latest upgraded 3G, 4G and new 5G technologies. As part of Cornerstone continued network improvement program, there is a specific requirement for coverage at this location to ensure that the latest high-quality 3G and 4G service provision is provided in this area of the Wrexham. The proposed upgrade will also ensure that new 5G coverage can be provided at this location. This ensures that coverage and capacity requirements are maintained and enhanced. Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they are. With the advent of new technology, under the banner of 5G, further advances are proposed and Central Government has seen the telecoms industry, and in particular 5G, to be at the forefront of economic development. This site will enable improved 5G coverage to be provided to this area of Johnstown. The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. That is why the Government is committed to extending mobile geographical coverage further across the UK, with continuous mobile connectivity provided to all major roads and to be a world leader in 5G. This will allow everyone in the country to benefit from the economic advantages of widespread mobile coverage. As well as improved mobile signal, 5G networks are also crucial to drive productivity and growth across the sectors that local areas are focusing on through their emerging Local Industrial Strategies. Enabling and planning for 5G implementation is central to achieving the Government's objective to deliver prosperity at the local level and enable all places to share in the proceeds of growth. 5G service provision will bring faster, more responsive and more reliable connections than ever before. More than any previous generation of mobile networks, it has the potential to improve the way people live, work and travel, and to deliver significant benefits to the economy and industry through the ability to connect more devices to the Internet at the same time, the 'Internet of Things'. This will enable communities to manage traffic flow and control energy usage, monitor patient health remotely, and increase productivity for businesses and farmers, all through the real-time management of data. The demand for mobile data in the UK is increasing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand. The radio base station will also meet the extra demands on the network in this area as more people use internet-enabled handheld devices. It is a densification project for the operator's network to fill holes in service provision including coverage and capacity. This will enable the
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operator's customers to be able to use their handheld devices without calls being dropped or buffering occurring where there is a gap in the operator's network coverage and capacity ability. A site in this location will fill the gap in service provision and provide high quality, reliable, advanced 3G, 4G and 5G to this urban area of Johnstown.

The proposed site is located in an area to the north of the town and is predominantly residential with a local amenities in the vicinity and rural open space. There is very little in the way of commercial or business premises that would otherwise be considered as suitable locations. The buildings are all residential, with low level and pitched roofs that are unsuitable for this type of development. The site itself is on the roadside of the pavement and has street lighting poles and trees that line the road, with pylons in the background.



Enclose map showing the cell centre and adjoining cells if appropriate:

As part of Cornerstone's continued network improvement program, there is a specific requirement for a new site at this location, to ensure that the latest high-quality 3G and 4G service provision can be provided in this area of Johnstown for Cornerstone. The proposed new column will also ensure that new 5G coverage can be provided at this location and ensures that coverage and capacity requirements are maintained.

The proposed new tower has been sited and designed in order to provide 5G coverage and to fill the hole in coverage for this mobile network. At present, it is paramount that digital connectivity is supported and maintained throughout the country. In particular, the current massive shift in user demand from city centres and places of work to residential areas and

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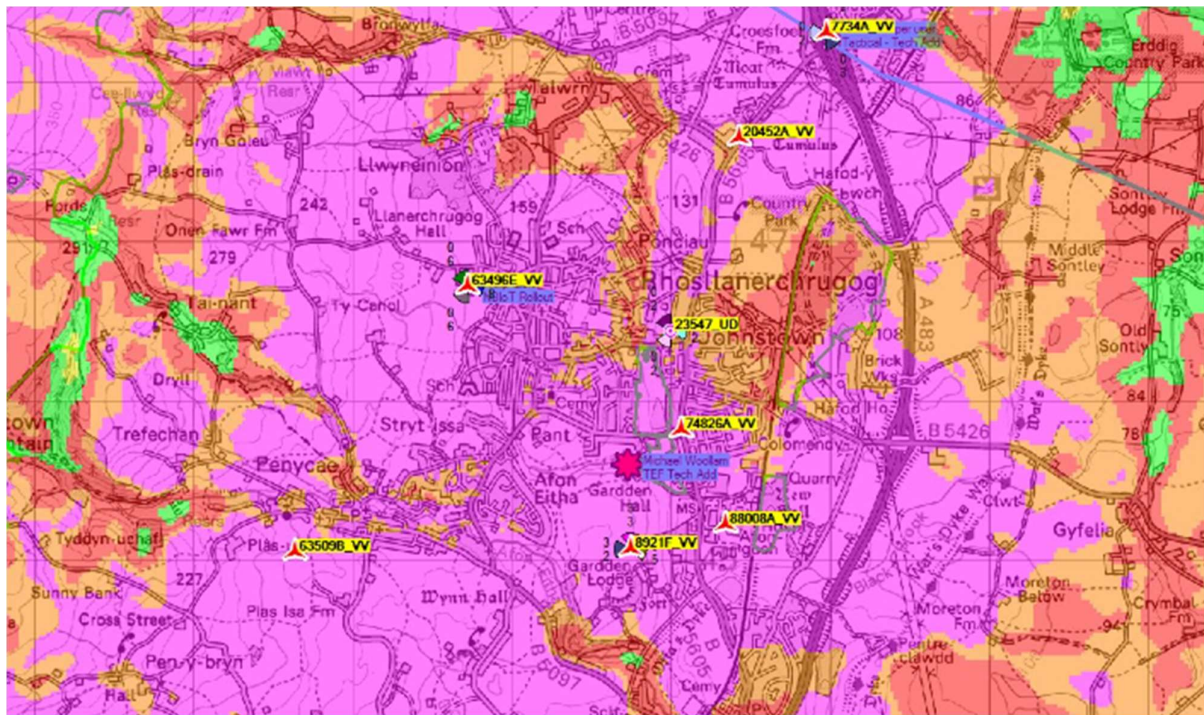
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suburbs requires an improvement in coverage and capacity throughout the whole network. The current proposal, therefore, provides such additional capacity to the network whilst still promoting the improved 5G technology.

The 3G and 4G provision allows internet access, video calling, data downstream, accessing social media networks and emailing to name just a few of the benefits. Therefore, to maintain high-quality indoor 3G and 4G services in this area would promote activity in line with the general population demand as the ownership of smart devices increases. 5G service provision will bring faster, more responsive and more reliable connections than ever before.

The search area is very small for this new installation. The existing sites in this area of Johnstown are struggling to cope with demand and an increase in capacity is required; therefore, a new site is required to provide reliable high-quality 3G, 4G and 5G technology.



Type of Structure (e.g. tower, mast, etc):	
Description: Streetworks monopole – Please refer to the drawings for details.	
Overall Height: 20m	
Height of existing building (where applicable):	Metres
Equipment Housing: Commscope - Cheshire	
Length:	1900 mm
Width:	640 mm

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Height:	1721 mm
Equipment Housing: Commscope – PSC	
Length:	823 mm
Width:	640 mm
Height:	1721 mm
Equipment Housing: Commscope - Derby	
Length:	823 mm
Width:	600 mm
Height:	1721 mm
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Steel grey
Equipment housing – type of material and external colour:	Steel green

Health and Safety - including ICNIRP compliance

The proposed installation conforms to current government planning guidelines regarding potential health effects arising from telecommunications development. The operator has attached a declaration that the site conforms to ICNIRP guidance. This is in full accordance with PPW.

Recent court cases have confirmed that the *public perception* of health risks can be a material consideration within the land-use planning system. The weight to be attached to this issue has to be determined accordingly in each case by the decision maker. It has been generally held, and widely established at planning appeal, that health concerns are not a sufficient basis alone for withholding planning permission providing it has been demonstrated that the proposed installation will comply with the ICNIRP guidelines.

The publication of the National Planning Policy Framework continues to highlight the Governments view that the planning system is not the appropriate mechanism for determining health safeguards. It sends a clear message to local planning authorities stating that they must 'determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure'. This is reiterated in the Code of Practice.

Notably, Ofcom have now undertaken 5G audits in the major cities and the results indicate that the exposure levels are a small fraction of the limits. This further reinforces the PHE guidance in respect of 5G which states: "It is possible that there may be a small increase in overall exposure to radio waves when 5G is added to an existing network or in a new area. However, the overall exposure is expected to remain low relative to guidelines and, as such, there should be no consequences for public health." (<https://www.gov.uk/government/publications/5g-technologies-radio-waves-and-health>).

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement. Proposals to improve capacity will not generally require coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity

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There is a specific requirement for an upgrade to the existing antennas and associated equipment cabinets at this location to allow the Operator to improve their 3G and 4G coverage and capacity in and around the Moor Allerton area and be able to provide new 5G service provision to this cell. This ensures high-quality indoor service provision is provided.

The dynamic nature of technological advances in the telecommunications industry coupled with ever-increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their license requirements, mobile operators are constantly developing their networks including filling holes where there is currently a lack of service provision.

Cellular networks are made up of several individual cell areas, each of which has a base station within it. A good analogy for describing a cellular network is that of a patchwork quilt with each cell area being one of the many patches that are sewn together making up the network 'quilt'.

Notably, there are 3 main elements to a radio base station; the cabin or cabinets contain the equipment used to generate the radio signals(s), the supporting structure that holds the antennas in the air or fixes them to a building or structure and the antennas themselves, which emit the radio signals (along with the necessary amplifier or receiver units). Other elements necessary for the base station to function are a power source, feeder cables that link the equipment housing to the antennas and the various support structures, grillages and fixings, often referred to in general terms as '*development ancillary to*' the base station.

These base stations then receive and transmit to mobile devices using radio waves. The antennas operate like an aerosol spray with the signal transmitted along a central orientation and dissipating with distance. The dishes operate on a direct line of sight basis, linking with dishes on other base station sites elsewhere within the wider network. The dish links also link the base station to a tower control centre that manages the call handover process that occurs when a mobile user moves from one cell area to another. They also provide telemetric monitoring to ensure the site is working properly and offer remote maintenance.

In the early days of mobile communications, peripheral locations, high-level topographies and large-scale towers were often identified in order that transmission from a new base station could cover an expansive geographical area. However, whilst this approach was viable for early network generations, the number of mobile handset users has dramatically increased with time, as have the advancements in mobile technology itself. As a result, the cellular network construction and operational criteria have changed too. Because modern networks use higher frequencies with faster data rates whilst serving significantly increased numbers of mobile device users, typical network cell areas (i.e. the geographical area targeted for coverage for which a base station development provides a solution), are now smaller in their geographical expanse and tend to be directly proportionate to the number of users within it. They are also therefore greater in their number with base stations operating at a lower power output than their predecessors.

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Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means the operator needs to position base stations in, or close to, residential areas.

Mobile connectivity and service is required where customers live, work and play. 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine-to-machine connectivity, automated transport/industry and other 'smart' applications. To this end, the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

In the UK, rollout is now commencing. The main benefits of 5G are that it will be much faster and have higher capacity than 4G, with download speeds in excess of 1Gbps. To place this in context, customers will be able to download - not merely stream - a full HD movie in less than 10 seconds on a 5G network. The same task would take closer to 10 minutes on 4G.

The case for 5G is compelling as it will bring faster, more responsive and more reliable connections than ever before.

The Local Government Association (LGA) has produced a Councillor's Guide to Digital Connectivity and sets out some of the benefits of 5G technology:

- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices.
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help council's and businesses deliver services more efficiently including:
 - Transport and logistics: connected parcels and fleet tracking.
 - Health and social care.
 - Environmental monitoring: sensors monitoring air quality and water pollution in real-time.
 - Smart agriculture and smart animal farming, smart retailing.
 - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even the road infrastructure.

Good connectivity allows people to access a wide range of essential services including emailing; downloading apps; social media; helping with homework; researching local events, businesses or transport timetables; managing personal finances; shopping; contacting local authorities; arranging medical appointments; general business functions; and much, much more.

5. Site Selection Process

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Reasons for choice of design and location

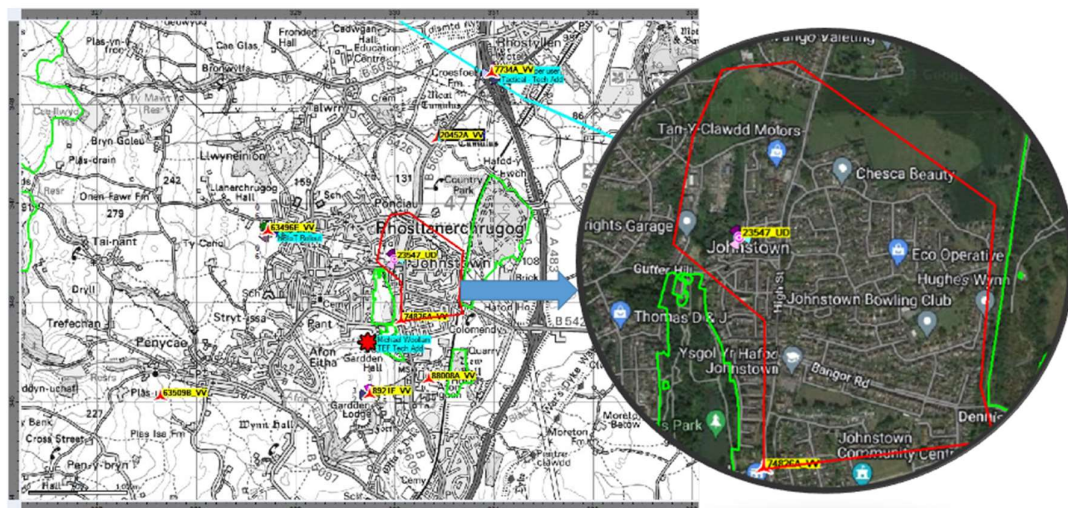
Cornerstone is the UK's leading mobile infrastructure services company. We acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers.

The National Planning Policy Framework advocates site sharing, however we believe that there are no sequentially preferable locations within the defined site search area. The proposed facility will provide coverage including 2G/3G/4G services and essential 5G coverage all from the same installation which is designed specifically for the purpose of urban locations such as the coverage area. This is fully in line with national guidance which supports the use of high-quality communications infrastructure and states that local planning authorities should support the expansion of electronic networks.

The search of the area began with the identification of the existing telecommunications sites in the vicinity, of which there are none in the search area which it should be reiterated is predominantly residential. The search then concentrated on the identification of suitable rooftop and greenfield locations, which were also discounted for the reasons outlined below. It was at this stage that the Streetworks option was considered, as it was assessed that it provided the optimum level of coverage that justifies the selection of the site whilst maintaining the integrity of the local amenity in the wider vicinity.

For this type of development for urban densification, the general residential nature of the majority of the area means that creating an impact is unavoidable and the Operator has to choose a location that minimises this to an acceptable level.

Search Area – in Red Border



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Alternative sites considered and not chosen (not generally required for **upgrades/alterations to existing sites** including redevelopment of an existing site to facilitate an upgrade or sharing with another operator)

Option	Site name and address	National Grid Reference	Reason for not choosing site
D1	Pavement opp 13 Clawdd Offa, Johnstown, Wrexham LL14 1NP	E: 330011, N: 346501	The site is located at the nominal location but is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh.
D2	Royal British Legion, 11 Maelor Road, Johnstown, Wrexham LL14 1NB	E: 329969, N: 346394	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh. The site was also considered to have insufficient space to safely accommodate the equipment.
D3	The New Inn car park, Wrexham Road, Johnstown, Wrexham LL14 1NU	E: 330081, N: 346417	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh. The site was also considered to have insufficient space to safely accommodate the equipment.
D4	Pavement o/s BP garage, Wrexham Rd, Johnstown, Wrexham LL14 1PA	E: 330143, N: 346606	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh.
D5	Pavement opp 36 Brynhyfryd, Johnstown, Wrexham LL14 1PR	E: 330133, N: 346374	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site

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			that the benefits of the proposal would not outweigh.
D6	Pavement opp 53 Brynhyfryd, Johnstown, Wrexham LL14 1PR	E: 330461, N: 346528	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh.
D7	Pavement opp 79 Brynhyfryd, Johnstown, Wrexham LL14 1YE	E: 330575, N: 346452	The site is considered to be more prominent in terms of its proximity to the residential properties and as such was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh.
D8	Johnstown Bowling Club, Bryn Avenue, Johnstown, Wrexham LL14 2SU	E: 330474, N: 346160	The site was judged to have insufficient access to a location that would provide the necessary coverage and insufficient available space to accommodate the proposed equipment.
D9	Pavement opp 19 High Street, Johnstown, Wrexham LL14 2SN	E: 330111, N: 346327	The site is considered to be more prominent in terms of its proximity to the residential properties and the war memorial. As such the site was assessed as having a greater impact on the amenity of the area compared to the proposed site that the benefits of the proposal would not outweigh.

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Existing Sites

Option	Site name and address	National Grid Reference	Reason for not choosing site
ES1	Hafod Tileries, Hafod Rd, Hafod, Ruabon, Wrexham LL14 6ET	E: 331001, N: 346292	The location is outside of the coverage area and would not provide the necessary coverage that would justify the selection of the site compared to the proposed position when compared to the proposed site.

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Additional alternative site options information:

The cell search area is illustrated below and as with all 5G cells, is extremely constrained so the only viable option has been put forward. Options are extremely limited due to the nature of the densely packed residential area (illustrated in the DSA - Designated Search Area) and the only viable solution that minimises amenity issues has been proposed. The DSA and coverage plan shows that there is no scope to move the mast outside of this area due to the risk of interference that would not only prevent coverage being provided to the DSA, but will also degrade the 5G coverage in the wider area.

The main area that the proposal intends to cover is the residential areas off Wrexham Road. The majority of the area is dominated by low-density residential properties with narrow pavements which allowed us to discount the majority of the area around the search area. It should be noted that a minimum of 2.2 meters pavement width is required in order to maintain pedestrian safety. As such, the area to the north of Wrexham Road is the only viable general location that can accommodate telecoms equipment, given that there is a greater amount of available footway available. Further options were investigated, but the precise location was chosen because it offered the most discreet option that provided the most effective coverage, while not adversely affecting the amenity of the residential areas.

Land use planning designations:

The proposal is on the boundary, just outside of the Green Barrier. As outlined above, an impact caused by the development is unavoidable and in this case the location minimises that impact to residential areas to an acceptable level. Whilst the location is close to the Green Barrier and the nearby pylons, this is considered to be preferable than locating the equipment within the residential area itself.

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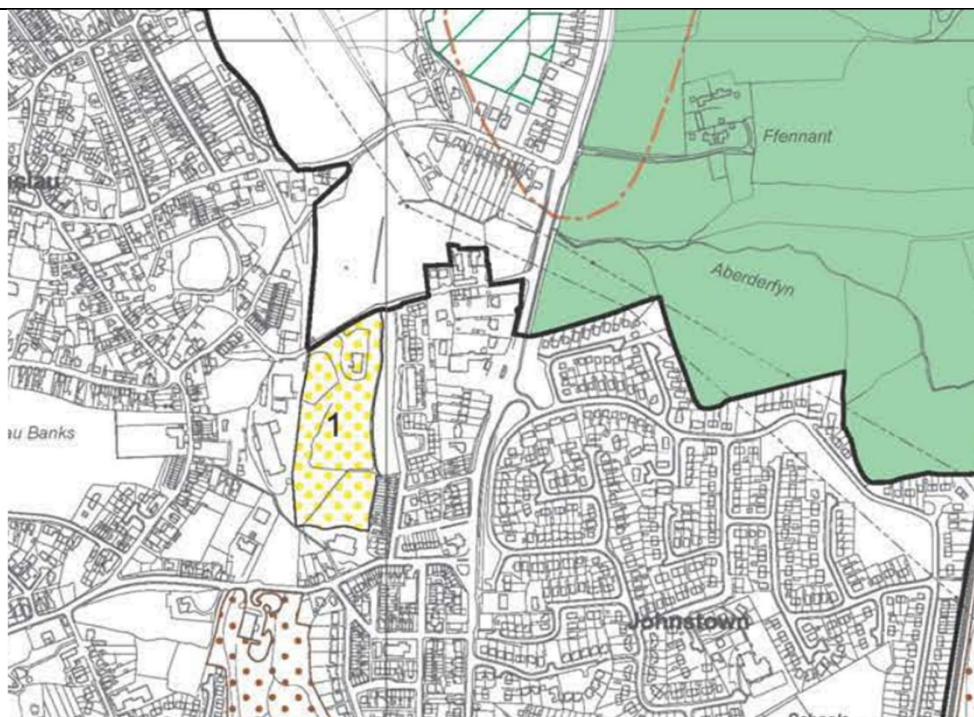
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Additional relevant information (include planning policy and material considerations):

National Planning Guidance

Planning policy is provided at the national level by Planning Policy Wales (PPW) Edition 11. It is a material consideration in planning decisions. Planning Policy Wales 11 is very similar to Planning Policy Wales 10 in relation to telecommunications development and remains largely the same in this respect.

Planning Policy Wales Edition 11 was issued on 28 February 2021. It refreshes PPW 10 incorporating the National Development Framework (published as Future Wales – the National Plan 2040) to set out how the planning system at a national, regional and local level can assist in delivering the Government's requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars and policy clarification letters, which together with PPW provide the National Planning Policy Framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise National Planning Policy.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-Being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

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PPW sets out Welsh Government Duty. The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. PPW defines sustainable development as:

'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.'

Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.'

Paragraph 1.18 of PPW states that legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

Paragraph 2.8 of PPW11 states *'planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working [consideration of involvement; collaboration; integration; prevention; and long term factors], as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle'.*

PPW11 at paragraph 2.27 provides advice relating to the sustainable benefits of development. *'Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle'.*

The Well-being of Future Generations (Wales) Act sets out 7 well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. Two of these goals are relevant to telecommunications development: A Prosperous Wales and A Wales of Cohesive Communities.

PPW sets out its goals for 'A prosperous Wales' which includes the development of modern and connected infrastructure to allow everybody to have a good quality of life by living in strong and safe communities, with access to decent jobs. It also acknowledges in Chapter 5 that 'A Prosperous Wales' can be achieved through increased economic activity across all sectors and at all scales. This is realised through the availability of inter alia reliable telecommunications networks. An installation in this location would fully meet this national policy requirement.

PPW states that to foster Cohesive Communities development will need to be well-connected. It goes on to acknowledge in Chapter 5 that Cohesive Communities are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours. Having access to a high quality, reliable and advanced telecommunications network fully complies with Chapter 5 of the PPW.

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PPW notes the importance of high quality telecommunications. Paragraph 3.61 states that 'adequate and efficient infrastructure' including services such as *'telecommunications is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working'*.

The Welsh Government's continuing strong support for telecommunications is demonstrated within the revised edition 11 of PPW because the telecommunications section is still included within the 'Productive and Enterprising Places' Chapter.

Chapter 5 of PPW11 continues to include telecommunications in the Productive and Enterprising Places which includes telecommunications. It defines Productive and Enterprising Places as *'those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle the climate emergency'*.

Places which are productive and enterprising contribute to the seven goals of the Well-being of Future Generations Act which include inter alia:

A Prosperous Wales can be achieved through increased economic activity across all sectors and at all scales. This is realised through inter alia reliable communication networks.

A Healthier Wales can be achieved through the reduction in emissions and air pollution.

A more Equal Wales can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.

Cohesive Communities are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours.

A Globally Responsible Wales is promoted by reducing our carbon footprint.

Productive and Enterprising outcomes are acknowledged as being inter alia:

- Promoting physical and mental health and well-being;
- Convenient access to goods and services;
- Minimising the need to travel;
- Not car dependent;
- Good connections;
- Embraces smart and innovative technology; and
- Enables easy communication.

The proposed radio base station would meet all the above objectives.

PPW identifies key issues for the Productive and Enterprising Places theme as being inter alia:

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- Readying Wales for further technological innovation in the mobile and broadband sector so it can adapt to future change while ensuring that all parts of Wales have access to modern communication systems;
- Increasing the use of integrated digital communications and technology to create 'smart places' and the implications of this for the way we travel, communicate, work and socialise;
- Supporting and enabling...infrastructure to support progress towards a circular economy.

Providing the digital infrastructure to provide high quality 3G, 4G and 5G in the Station Terrace area is a precursor to enable all the above key issues to be addressed. Without access to mobile connectivity the above cannot come to fruition.

The revised PPW continues to acknowledge that new developments should be electronically connected to enable efficient access to the internet and communications system to drive forward economic competitiveness, increase flexible working opportunities and minimise digital exclusion.

Chapter 5 outlines the benefits of economic infrastructure. Section 5.1 sets the context and notes that infrastructure, be it physical, electronic or digital, plays a pivotal role in maintaining the economic well-being of Wales. It enables people to connect and interact with each other, either in person or electronically, to increase prosperity. It enables effective communication between people and businesses and provides a place for people to work and enjoy our natural and cultural assets. Poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity and the well-being of communities. A radio base station in this area of Powys is vital for the economic well-being of the Station Terrace area.

Section 5.2 relates specifically to electronic communications and notes *'affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people are connected to important services, their communities and the wider world and essential for long term prosperity. Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home whether accessing new digital services or working. Greater numbers of individuals working from home are a growing trend and planning authorities should take this into account when preparing their development plans. Providing access to 4G and the latest 5G services fully meets the PPW in this respect.'*

Paragraph 5.2.2 acknowledges the importance of high quality communications. It states that *'modern society demands reliable fast and high capacity communication networks to ensure large amounts of data can be easily accessed or exchanged. It is the Welsh Government's objective to offer fast and reliable broadband to every property in Wales and to support the deployment of mobile infrastructure across the country'*. The proposed installation fully meets this Welsh Government objective.

PPW offers guidance on telecommunications stating at paragraph 5.2.5 that *'the planning system should help support telecommunications infrastructure where it is required, whilst taking in to account the status of protected land and buildings as well as amenity considerations to protect what is valued most in our communities and environment'*.

Paragraph 5.2.9 makes it clear that *'planning authorities should not question the need for the telecommunications system nor seek to prevent competition between different operators'*.

Paragraph 5.2.12 goes on to state that *'the sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution... for example in designated or sensitive'*

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landscape areas. The design of masts will be an important consideration where sharing is likely to be the preferred approach and efforts to disguise apparatus should be pursued where necessary. Wherever possible, use should be made of existing buildings and other structures to site new equipment...Siting should allow for the greatest possible coverage while, so far as is practicable, minimising the impact on amenity and the external appearance of a building'. There are no existing buildings or structures within the operators search area which are suitable to provide the necessary coverage to the target coverage area. As such, a ground based installation is proposed. The height is the minimal possible to clear the trees, buildings and urban clutter, whilst providing the latest 3G, 4G and 5G coverage and capacity into the local area. The design is simple, unfussy, functional and vertical and resembles as closely as possible other items of street furniture taking into account the operator's technical requirements for this essential item of digital infrastructure. As noted in the recently revised Code of Best Practice telecommunications poles will be significantly taller than streetlighting columns and other street furniture. A streetlighting column cannot provide 5G mobile broadband service over a relatively wide distance and so while both are acceptable in the streetscene they should be considered under the same principles as each are designed to carry different task and therefore have different technical requirements.

PPW provides clear advice regarding health matters at paragraph 5.2.15 and states that:

'provided that the development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, planning authorities should not consider the health aspects of mobile telecommunications equipment. All new base stations are expected to meet the ICNIRP guidelines' (Paragraph 5.2.15).

Planning authorities should not implement their own precautionary policies, such as imposing a ban or moratorium on new telecommunications development or insisting on minimum distances between new telecommunications development and existing development' (Paragraph 5.2.16)'.

A declaration of ICNIRP compliance has been provided with the application documentation for this proposed radio base station and as such in line with PPW there is no requirement to consider health matters as part of this application.

Mobile Action Plan – Welsh Government (October 2017)

Following on from the Welsh Ministerial Statement, the Welsh Government published its Mobile Action Plan at the beginning of October 2017. It has two main sections which are relevant to telecommunications applications Mobile Connectivity in Wales and Planning.

The Mobile Connectivity in Wales section highlights the importance of mobile connectivity and how it is growing. It notes that the expectations of the mobile signal are rising, with customers wanting mobile connectivity where they live, work and want to travel. Businesses too want to take advantage of the opportunities that connectivity affords them and do not want to endure the lost opportunities that lack of connectivity costs them.

The Welsh Government recognises the growing importance of mobile technologies and wants to create the right environment to encourage further investment in mobile infrastructure and to promote innovation in mobile technologies.

The Mobile Action Plan goes on to state that mobile connectivity not only directly supports the United and Connected theme through connecting people and communities but also supports the other 3 themes by enabling business connectivity, the delivery of public services and learning opportunities.

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Access to a useable mobile phone signal also **supports all of the Well-Being of Future Generations Act Goals** (emphasis added).

The challenges that Wales faces are highlighted in the Ofcom Connected Nations 2016 report which reveals that for the majority of coverage measures Wales is less well served than the other UK nations. The Ofcom Connected Nations 2019 Report which was republished in March 2020 notes that there is still a wide variation in geographic coverage of mobile operators networks which remains poor in many areas. Indeed, it states that only 58% of Wales is able to receive 4G data services from all operators compared to 81% in England. An installation in this location where there is hole in coverage provision for CK Hutchinson Networks (UK) Ltd will help to address this imbalance.

The mix of significant population in mountainous and very rural areas creates very specific challenges which require significantly more infrastructure to provide coverage than other areas of the UK. If mobile coverage is going to improve there will need to be an increase in the number of mobile infrastructure sites in Wales, including in more scenic areas.

The Action Plan section on Planning acknowledges that the planning system has a key part to play in maximising mobile phone coverage across Wales. It is important that the planning regime is fit for Wales and reflects its topography and population distribution.

Digital Communication in Wales Report and Recommendations of the National Infrastructure Commission for Wales (December 2020)

The Report presents the findings of the National Infrastructure Commission for Wales investigation into digital communications infrastructure in Wales. The work was undertaken between mid 2019 and mid 2020 but disrupted by the COVID-19 pandemic after March 2020. The report notes that households and businesses have already obtained very significant economic and social benefits from adopting new digital communications technologies like superfast broadband or 4G.

Page 4 of the Report highlights the importance of digital connectivity during the pandemic:

'The pandemic also underlined the critical role that is played by digital communications in modern societies in allowing people to continue to live their lives without regard to the physical distances between them.'

The report goes on to acknowledge that young people and businesses place great importance on connectivity and will move to where there is a good reliable connection:

...'businesses and young people cannot afford to wait in the hope that a fibre connection will become available 10 years from now. They will move to somewhere where fast reliable broadband is already available in the meantime...

...the evidence shows that nations that are leaders in digital communications in one technology cycle tend to remain the leaders for subsequent generations. The opposite is also the case'...

On pages 4 and 5 of the report the Commission sets out that more attention should be paid by policy makers to supporting mobile connectivity:

'...we think too much attention has been paid by policymakers to promoting fibre to the home technology in the UK and not enough on improving mobile broadband provision, including using 4G and 5G connections to provide home broadband services instead of, or ahead of, fibre

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connections. The UK is behind most other countries in this regard, and only 3% of the total data traffic in the UK is carried over mobile networks today, much less than in most other countries. We think Wales can and should be doing more with this mobile infrastructure'.

Page 5 goes on to note:

'mobile broadband technologies offer benefits which fixed broadband connections cannot offer, both in terms of availability whilst on the move and, importantly, the speed at which the infrastructure itself can be rolled out. 'Home' mobile broadband connections can be a good, low cost option for households in rural areas, either until fibre turns up or on a permanent basis. The latest generation of mobile technology will also support a range of new applications for businesses and public authorities which prioritise significant economic and social benefits over the next 10-15 years. Importantly, the adoption and use of new mobile technologies tends to occur more quickly than with new fixed broadband technologies'.

The Commission's findings fully support home broadband services delivered over 4G and 5G mobile networks. This is because they are best placed for households and businesses to obtain access to significantly better broadband than they have today.

Technical Advice Note 19 Telecommunications (August 2002)

TAN 19 is somewhat dated, published in August 2002, it makes reference to the Stewart Report which is now dated and makes no mention of the 4G network. Therefore, PPW Edition 11 has greater material weight in the determination of telecommunications applications.

Paragraph 32 of TAN 19 states that development plans should cater for telecommunication development by taking account of the strategic requirements of telecommunications networks. Development Plan policies should take account of:

- The Assembly Government's overall policy approach to planning for telecommunications development set out in Chapter 12 of Planning Policy Wales.
- The requirements of the Telecommunications Act 1984.
- The need to minimise the impact of development and in particular the need to protect the best and most sensitive environments.
- The limitations imposed by the nature of the telecommunications network and the technology.

With regard to technical constraints, Paragraph 46 states that *'each telecommunications system has different antennas, siting needs and other characteristics. Planning authorities should have regard to any technical constraints on the location and proposed development. Each application should be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include the significance of the proposed development as part of a national network'.*

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In terms of environmental considerations, paragraph 56 identifies that an important consideration in determining applications will be the protection from visual intrusion and the implications for subsequent network development. It acknowledges that masts and antennas often require a particular operating height which allows signals to clear trees and urban clutter. Telecommunications development may therefore need particular locations in order to work effectively. But this may conflict with policies for the protection of high quality landscapes and quality in urban areas. High priority should be given to protecting such areas and the need to safeguard areas of particular environmental importance. Therefore, the site has been located as far away as possible from the residential nature of the area and near commercial units.

Additionally, paragraph 57 considers mast and site sharing, stating that Local Planning Authorities may expect applications to identify that the possibility of erecting antennas on an existing structure has been explored. An authority should, however, bear in mind the technical constraints upon network development in reaching any decision on an application before it (paragraph 58).

Furthermore paragraph 65 identifies the consideration of siting and design in addition to the height, ancillary development and the scope for landscaping and screening. It also states that, *'many antennas have special siting needs because they have a limited range or require line-of-site. Authorities should take full account of these needs.'*

Paragraph 66 goes on to state that 'Local planning authorities should ensure that they understand the constraints the operator faces, whether due to the nature of the technology or the legal requirement to provide a service'.

Paragraph 67 encourages the use of sympathetic design and camouflage to minimise the impact of the development on the environment.

Paragraph 68 relates to design solutions for minimising the visual impact on the area. It states that 'the telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of the masts and antennas but also the materials and colouring. A number of different design solutions are currently available. These include masts designed to look like street furniture'.

Code of Best Practice on Mobile Phone Network Development for Wales (March 2021)

The latest version of the Code of Best Practice on mobile phone network development was published on 10 March 2021². This document replaces the code of best practice published by the Welsh Government in 2003. It has been produced jointly between Welsh Government, planning authorities and the mobile industry in the light of changes to the planning legislation and policy and is intended to facilitate the smooth roll-out and upgrading of mobile telecommunications apparatus in Wales.

The purpose of the Code is to encourage better communication and consultation between telecommunications operators, local planning authorities and local communities, and to help standardise planning procedures and operator practices to improve consistency of decision making and implementation. The Code also helps explain technical features of mobile systems and provides good practice guidance on the siting and design of new telecommunications development.

² <https://gov.wales/sites/default/files/publications/2021-03/code-of-practice-mobile-phone-network-development.pdf>

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The previous Code was issued in 2003. Whilst many of the principles outlined in that document are still relevant today, significant changes in the telecommunications industry have taken place including changes in technology and societal expectations relating to telecommunications and the infrastructure required to support mobile phone networks. The number of mobile devices has continued to grow, both in terms of mobile phones and other internet connected devices. The advent of 4G and new 5G technology has seen a dramatic increase in the amount of digital data used by mobile devices, and the growing demand for services has led to the deployment of more telecommunications infrastructure across Wales.

The latest version of the Code outlines the importance of current and future mobile technology in modern society, and how it relates to Welsh Government priorities expressed in the programme for Government. The Code also addresses the Siting and Design of mobile infrastructure, particularly considerations pertinent to the introduction of newer technologies and the technical and operational requirements of mobile phone networks in different circumstances.

The revised Code acknowledges the importance of telecommunications in the introduction stating:

'Affordable, secure digital infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people and businesses are connected to communities and the wider world and are essential for long term prosperity. Modern society demands reliable and fast communication networks to drive economic activity, to allow people to keep in touch and to access public services.'

Mobile connectivity plays a central role in digitally connecting people and businesses connecting them to the internet, the cloud and to each other...

...Modern mobile connectivity can facilitate home working and support inward investment for businesses, which create jobs for local people and minimise 'urban migration', underpin social benefits and provide access to emergency services...

At Annex A the importance of mobile connectivity is further acknowledged at para 22:

'The introduction of improved connectivity will benefit the whole of the community and is a public benefit socially, economically and commercially. As such planning authorities should encourage improvements in digital connectivity and seek to assist MNOs [Mobile Network Operators] in finding suitable locations for new equipment'

The Code sets out how mobile connectivity meets the 4 strategies of the Welsh Government Programme, Taking Wales Forward: prosperous and secure; healthy and active; ambitious and learning, and united connected stating:

'Mobile connectivity directly supports the United and Connected theme through connecting people and communities but also supports the three others by enabling business connectivity, the delivery of public services and learning opportunities'.

The Code also acknowledges how it helps meet the ambitions set out in the Future Generations and Well-Being Act by enabling communities to connect, supporting participation, enabling education and skills, and providing access to key services.

It is noted that over 95% of households in the UK own at least one mobile phone. As such, the Code acknowledges that the ubiquity of mobile telecommunications means that it is an essential element of

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modern life and the Welsh Government is committed to supporting the roll out and upgrade of the mobile phone network.

The Code sets out its aims which are fourfold:

- To support the roll out of mobile phone infrastructure and to provide guidance with regards to the complex requirements associated with network deployment;
- Set out an engagement framework for mobile network operators and planning authorities when considering applications for prior approval and/or full planning permission for the improvement of mobile networks;
- Seek to avoid areas of conflict and to minimise any perceived adverse impacts with the provision of telecommunications equipment;
- And support a more collaborative approach to the deployment and improvement of digital connectivity throughout Wales.

The Code sets out how technology has evolved over the years from 2G (voice and text messages) to 3G (internet and other data on the move) to 4G (superfast mobile broadband at speeds roughly equivalent to those you would expect from a fixed broadband connection) to the advent of 5G networks which bring very high speed, high bandwidth and low latency connectivity not just for use with mobile handsets but also for a range of other internet of things (IoT) uses including industrial and real time monitoring.

The Code acknowledges that the mobile phone technology uses differing parts of the radio spectrum to broadcast signals to and from infrastructure such as masts to mobile phone handsets. Different spectrum bands have different characteristics, which affect the extent of coverage and how much data can be carried.

The Code provides guidance on siting and design and the search criteria for a new installation:

- Having existing or ready access to a power supply;
- Access to fibre optic cables;
- An existing vehicular access, and
- Other buildings and development which may provide a level of existing screening.

The Code of Best Practice states that planning authorities should consider these issues and balance the need for a site within a limited search area with the greater public benefit of improved connectivity. It should not be appropriate for planning authorities to seek wider evidence of alternative sites, unless they consider the solution is unacceptable having regard to all material planning considerations.

The Code goes on to note that all telecoms installations are principally guided by the technical need for the site and the technical constraints placed upon broadcasting a signal. The siting and design of such installations must therefore be balanced between perceptions of visual impact and the proposed installations' technical needs and constraints.

The Code acknowledges the main technical and operational criteria as:

- the need to provide an acceptable level of coverage both outdoor and indoor, over the intended geographical area.
- The need for backhaul, a connection to the wider network, is critical. Backhaul is ideally provided via fixed fibre optic cable links or if unavailable, via dish links. If a dish link is proposed, then a clear line of sight to the corresponding connection is required. This may well dictate the overall height of the installation rather than the broadcast requirements of the antennas. On occasion, where

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mountains and valleys are in the way, it may be necessary to 'bounce' the signal via more than one base station.

The Code acknowledges that where fibre is not available or to provide alternative secondary routing for resilience, installations may require transmission dishes which operate on a 'direct line of sight' basis to other dishes on corresponding installations on the network. To avoid latency, which would adversely affect real time applications because of the volumes of data, sites will have to link directly into other sites that have a fibre connection.

The sequential approach to new site selection is still advocated:

- *'Explore first the possibility of sharing any existing building or other structure;*
- *If no such structure exists, explore opportunities to locate sites within or close to other utilities or commercial development;*
- *If no such scope exists, explore opportunities for sites that are well screened by other development or natural features, such as trees, vegetation and undulating topography;*
- *Residential areas will require service provision and infrastructure may be required in close proximity to housing. However, prior to proposing a new site in a residential area, alternative solutions should be explored initially to ensure the proposal of least impact is progressed, while considering technical constraints;*
- *Heritage sites and assets may require service provision, and where this is the case infrastructure will be needed within or in close proximity to them. However, prior to proposing a new site in a heritage area, alternative solutions should be explored initially to ensure the proposal of least impact is progressed, while considering technical constraints'.*

The Code like the previous 2003 version still seeks designs to be simple and unfussy, with attention to finishes and colouration that might help minimise appearance. In assessing proposals, the Code states:

'In assessing proposals, planning authorities should have due regard to the special technical and operational considerations, and not seek to place or make unrealistic design demands. Planning authorities should give consideration to the balance between improved digital connectivity and the perceived visual impact of the development'.

Annex A sets out guidance on site selection and design. The Code acknowledges that many areas in Wales are protected or are heritage assets with many AONB and National Park designations which depend on tourism and Agri-industry for their overall sustainability. It notes that modern mobile connectivity can facilitate home working and support inward investment for businesses, which create jobs for local people and minimise 'urban migration', underpin social benefits and provide access to emergency services. These benefits and constraints should be taken in to consideration by LPAs:

'Planning authorities should understand the relevant benefits and constraints around deployment when considering proposals or taking part in pre-application discussions for proposals in protected areas'.

The Code supports minimising visual impact noting at para 4 *'where viable, sites should be deployed to make use of screening or backdrop. This could be in the form of buildings or vegetation but antennas must clear any surrounding 'clutter' that obstructs the signal and the service. Therefore, while siting should make use of screening, it is vital that the antennas are of a sufficient height'.*

The Code of Best Practice also highlights the difficulties that topography can pose for radio propagation

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at para 15:

'A mobile base station cannot provide service around valley walls or through hills it must be able to transmit over them for service provision. The taller a base station or the higher it is sited on a valley wall, the more it will be able to cover.

Planning authorities should be aware of the constraints topography poses when considering siting proposals for mobile base stations and take this into account when assessing proposals'.

The difficulties of site access for build and maintenance are also highlighted in the Code of Best Practice.

Para 22 notes the importance of radio base stations:

'The introduction of improved connectivity will benefit the whole of the community and is a public benefit socially, economically and commercially. As such planning authorities should encourage improvements in digital connectivity and seek to assist MNOs in finding suitable locations for new equipment.

Para 23 goes on to encourage collaborative working with the MNOs:

'where proposals are made within sensitive land use designations such as National Parks or conservation areas planning authorities should appreciate the difficulties regarding deployment and seek to find solutions collaboratively'.

Annex A provides more guidance on minimising visual impact such as masts should be coloured to match their backdrop to minimise contrast in an urban or rural setting (Para 24). Para 26 seeks cabinets and equipment housing to be coloured appropriately to assimilate with the setting. Para 27 goes on to advise that sites will be designed based upon structural requirement, radio functionality and to minimise visual impact. Poles are suggested to be used where there are vertical structures already in place such as flood lighting.

Para 28 notes that site sharing is supported in terms of minimising the number of sites required and reducing proliferation. However, sharing means the mast must be able to support all the equipment for all technologies for the operators. This is a significant amount of equipment both on the mast and at the base for the equipment housing. In order to support this equipment the mast must be robust and will often dictate a larger wider lattice type of design. This is more achievable and desirable in rural areas. If the column and shroud were to be any slimmer, then the multi technologies would not be able to fit in the same installation and an additional radio base station would be required which would be contrary to national planning guidance.

Paragraphs 36 to 38 relate to equipment housing principles. The equipment housing must be of a sufficient size to facilitate hosting numerous operating equipment while also allowing air circulation to reduce the potential for overheating. Para 38 states that planning authorities should be understanding of this need when considering proposals.

Local Policy

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

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Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.
Registered in England & Wales No. 08087551.
VAT No. GB142 8555 06

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Development Plan: Wrexham Unitary Development Plan (1996 - 2011)

Policy Relevant to the Development Site:

The site is designated as being within the settlement boundary but rural uses to the east and west. The site is near but not in the adjacent Green Barrier and as the designation is a material consideration we will address it below.

Wrexham Council has a specific telecoms policy, which together with the PPW11 is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the PPW.

Policy GDP1 Development Objectives

All new development should

- a. Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.
- b. Take account of personal and community safety and security in the design and layout of development and public/private spaces.
- c. Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.
- d. Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.
- e. Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.
- f. Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.
- g. Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

Policy CLF8 Telecommunications

The development of telecommunications facilities and related infrastructure will be permitted, having regard to technical and operational considerations, where an appraisal has been carried out;

- a. firstly, of the potential for sharing other masts and sites; if there is no potential
- b. secondly, of the potential to use existing buildings and structures; if there is no potential
- c. thirdly, of the potential to use other sites. The siting of any development should minimise the impact on the local landscape/ townscape, and should comprise measures of mitigation of any adverse impact, as appropriate.

Policy EC1 Green Barrier

Within Green Barriers, development will only be granted planning permission if it is for agriculture, forestry, essential facilities for outdoor sport and recreation, cemeteries and other uses of land which maintain the openness of the Green Barrier and do not conflict with the purpose of including land within it.

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Cornerstone Industry Site Specific Supplementary Information (England) V.8 – 11.12.2023

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The proposed works on this site would not be to the visual detriment of the surrounding area, and would not result in demonstrable harm to the character of the area, but are necessary to ensure improved delivery of service, would respect and continue to maintain the appearance of the area, and would be suitably distant from potentially sensitive users, so according with the principles of the Development Plan. The proposal fully accords with the requirements of the PPW.

The proposed height of 20m is acknowledged as being considerable, but the following points should be noted and used to undertake a balanced assessment of the proposal in terms of the benefits and the impact:

- Paragraph 9.8 states *'Modern telecommunications are an essential and beneficial element in the life of the local community and in the national economy. Much of the telephone network is, of course, long-established. New communications technology is now spreading rapidly to meet the growing demand for better communications at work and at home, in business and in public services. Modern telecommunications can also enable people to work with less need to travel, in accordance with the plan's strategic aims.'* We would contend that this is even more relevant and the importance of a highly functioning contiguous network continues to grow and without this proposed site, the Johnstown area will not benefit in an equal manner that the rest of Wrexham and Wales will.
- The location has been chosen as it has the least amount of residential properties overlooking the site and therefore does not adversely impact the amenity of the area in an unacceptable manner.
- The proposal has been located in as discreet a location as possible in an area that is predominantly low-density residential, that minimises the impact on nearby properties as much as possible. Furthermore, the site has been designed so that the height has been kept to the absolute minimum, with the pole using the surrounding trees as a backdrop and screening to minimise intrusion further afield.
- The height is required in order to provide full in-door coverage to the majority of the area. If the mast was to be reduced in height, then as many as 2nos additional towers with a minimum of 15m would be required to meet the coverage demand.
- The proposed location uses the presence of the existing street furniture and the trees as features that will reduce the impact of the proposal and the pole will only be visible in the immediate 10-20m of the site.
- The discounted options illustrate that the optimum location has been chosen with no other more suitable locations being available. There are no other sites that can be shared and the rooftops are low-level commercial design that would not be capable of accommodating the type of equipment that would be required. There are also no heritage or other locations of high cultural value that the proposal would impact upon.

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area; but are vitally necessary to ensure improved delivery of service. Capacity and coverage are the key drivers for this new 5G installation. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the Development Plan policies. It fully accords with the requirements of the PPW.

Practical Applications of 5G Connectivity as Example of Material Socio-Economic Benefit: -

Education:

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The relationship between 5G and education is evolving at a massive rate with educators exploring the relevance of Virtual Reality (VR) technologies for education and training. Crucially, VR can support remote learning, allowing students a presence in the classroom even when working elsewhere. 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security will also allow learning on the job, thanks to technologies such as Augmented Reality (AR) goggles, which can give engineers real-time instructions on how to fix a machine on a production line, for example.

Health:

Patients across the country are now becoming accustomed to relying on remote healthcare services such as NHS 111, virtual GP appointments, and ordering online deliveries of essential medical supplies. 5G will prove critical in providing the infrastructure required to deliver remote health services over the next decade. By design, 5G's ability to deliver real-time information (low latency), ultra-fast speeds (critical for high definition images and video), increased capacity and heightened security are going to be fundamental in scaling the patient benefits of remote healthcare and keeping medical records secure and private. For instance, trials have shown that connecting ambulance crews to expert resources using 5G allows paramedics to work with doctors and conduct specialist procedures in real time whilst on the road.

Confirmation that submitted drawings have been checked for accuracy

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Signed:	<u>Alan Osborne</u>	Date:	<u>11th March 2024</u>
Position:	<u>Consultant Town Planner</u>	(on behalf of Cornerstone)	

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