

Our Ref: 243409 - Pontfadog

Date: 23rd November 2022

The Chief Planning Officer
Wrexham County Borough Council
Planning Service,
16 Lord Street,
Wrexham,
LL11 1LG

Dear Sir or Madam,

Cellnex and EE Ltd and Hutchison 3G UK

Submission of an Application for Planning Permission

Proposed upgrades to existing telecommunications installation and ancillary equipment located at: Pontfadog, Bryniau Farm, Glyntraian, Pontfadog, Wrexham, Clwyd, LL20 7BE

On behalf of EE Ltd and Hutchison 3G UK Ltd, in conjunction with Cornerstone Telecommunications Infrastructure Ltd (CTIL), we submit herewith an application for planning permission for the development of 4G electronic communications apparatus at the above site. This planning application is submitted following the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

We accordingly enclose the following:

- i. The completed planning application form and certificates.
- ii. The requisite numbers of an O.S. site plan scale (1:5000) 14510-00-004-ML003 Rev 3 showing the red line area and blue line area.
- iii. Drawing nos.
 - 14510-02-120-MD007 Rev 7.A
 - 14510-02-122-MDOO7 Rev 7.A
 - 14510-02-170-MD007 Rev 7.A
 - 14510-02-171-MD007 Rev 7.A
- iv. Electronic payment of the sum of £460 in respect of the appropriate fee.
- v. National Policy - Delivering Ultra Fast Broadband Mobile Connectivity
- vi. A certificate of ICNIRP compliance

The Proposed Development

The operator(s) already provide coverage from an existing base station at this site, but have a requirement to install the 4G electronic communications apparatus referred to in this letter and shown in the submitted drawings.

The deployment of 4G will utilise the Mobile Network Operators (MNOs) existing 3G networks such as the base station already existing at the application site. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 4G higher capacity network apparatus subject of this application. As a consequence, this particular technical requirement is not one that can be met on an alternative site.

There is significant UK Government support for the delivery of 4G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. We explain this in more detail in the document ***'National Policy – Delivering Ultra Fast Broadband Mobile Connectivity'*** which supports this application. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets.

The amount of development, its design and the location of the apparatus at this existing electronic communications site has been guided by the technical and operational requirements of the operators 4G system having proper regard to minimise appearance.

Unlike earlier generations of mobile connectivity, 4G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus. To help explain this important detail.

Having regard to the nature and appearance of the structure as a whole, the proposed works should have no adverse impact, or no more than a minimal adverse impact, on its appearance. The 4G electronic communications apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

The site is located within an existing telecommunications compound within a rural setting with existing access to the site with adjacent screening from dense woodland. We do not believe the proposed upgrades will affect the visual amenity of the area and the apparatus proposed will not bring about any additional requirements with regard to access. Access to this operational site will, therefore, remain the same as the current arrangements as shown on Plan 14510-02-120-MD007 Rev 7.A.

In accordance with all relevant health and safety regulations and guidelines, access to the site is restricted to authorised personnel and access for maintaining or servicing all the apparatus can only be carried out by properly trained and qualified staff. Such routine operations will continue to be carried out roughly once a quarter, with no requirement to increase this arising out of the development proposed. The application does not therefore give rise to any public issues associated with access.

As the apparatus proposed will lead to significant improvements to a public service provided in the local area, the application merits support and accords in all respects with national policy as set out in our supporting document ***'National Policy – Delivering Ultra Fast Broadband Mobile Connectivity'***, especially Planning Policy

Wales and TAN19 guidance. The proposal looks to meet all relevant local policy within the Wrexham Local Development Plan 2 (LDP2) 2013 to 2028, specifically Policy CLF8 Telecommunications supports the development of telecommunications *“Modern telecommunications are an essential and beneficial element in the life of the local community and in the national economy.”* The proposed upgrade seeks to aid in improving telecommunications throughout the Wrexham area and directly support this policy.

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

We indicated in our prior engagement letter that the Traffic Light Rating was amber. The prior engagement carried out suggests this rating to be correct and we have not altered it.

Health and Safety

Every installation on a site owned or managed by Cellnex will be compliant with international standards adopted by the UK Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.

The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.

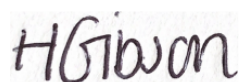
National planning policy remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

We would be willing to meet to discuss the merits of the application, or to assist with any visits of the site and surrounding area, if this is beneficial to the determination of the application.

As the proposal entails the development of infrastructure necessary for the delivery of vital 4G public services, we ask that you progress the determination of this application in an expeditious manner and request that you use your delegated powers if available.

We trust everything is in order, but please contact me if you require any additional information or clarification in relation to the proposed development.

Yours faithfully,



Hannah Gibson BSc (Hons)

Planner

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