

5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION STATEMENT PREPARED BY DOT SURVEYING
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1. Site Details

Site Name:	Rhyd Broughton Lane Street Works	Site Address:	RHYD BROUGHTON LANE PENTRE BACH WREXHAM LL13 7YP
NGR:	E: 332182 N: 350735		
Site Ref Number:	WRX24910	Site Type:	Proposed 5G telecoms installation: 15m high 'slim line' H3G street pole with cabinets and ancillary works.

2. Check List

Site Selection

Was the Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: It was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with the local planning authority Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	28.04.2023	
Name of contact:	Email Issued to the Planning Department	

Summary of outcome/Main issues raised:

CK Hutchison Networks (UK) Ltd is committed to providing improved network coverage and capacity, most notably in relation to 5G services. As shown by the unprecedented Covid-19 pandemic high-speed mobile connectivity is the lifeblood of a Community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The document Planning Policy Wales Edition 11 recognises that 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.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

AMBER

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

The site has been given an AMBER rating under the Traffic Light Model 'TLR'.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 24 of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019.

Full details of the scheme are outlined within the submitted planning drawings.

H3G consider a 'street works' installation positioned as per the attached drawings, is best suited to extend high-speed mobile coverage to the target community.

School/College

Location of site in relation to school/college:

1. Saplings Childrens Nursery
2. Active Childcare

Outline of consultation carried out with school/college:

Saplings Childrens Nursery and Active Childcare was issued with a copy of the Pre-application Site Details Sheet and drawings by email.

Summary of outcome/Main issues raised:

To the best of our knowledge there were no issues raised.

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: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	28/04/2023	

3. Proposed Development

The proposed site:
The proposed solution for improving 5G coverage here involves erecting a H3G 'slim line' street pole and additional equipment cabinets installation as per the supplied location plan. The technical details of this proposal are illustrated within the enclosed application design drawings. It is recognised that the very nature of installing new 5G communications infrastructure within an urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion. CK Hutchison Networks (UK) Ltd are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, CK Hutchisons Networks (UK) Ltd will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment, is such that we cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment.

The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward.

The site selection process has also been influenced by the topography of the area, trees and shrubbery around the vicinity of the site. The apparatus (pole and associated cabinets) will be carefully positioned on a small area of existing footpath, so not to impede pedestrians and to have the trees and shrubbery within the vicinity provide some screening. Please note, the design itself is typical of street furniture found in such urban locations.

The equipment is considered unlikely to have any material impact on the local area; however, it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity.

In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited. Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 5). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage.

Figure 1 - Site Photograph.



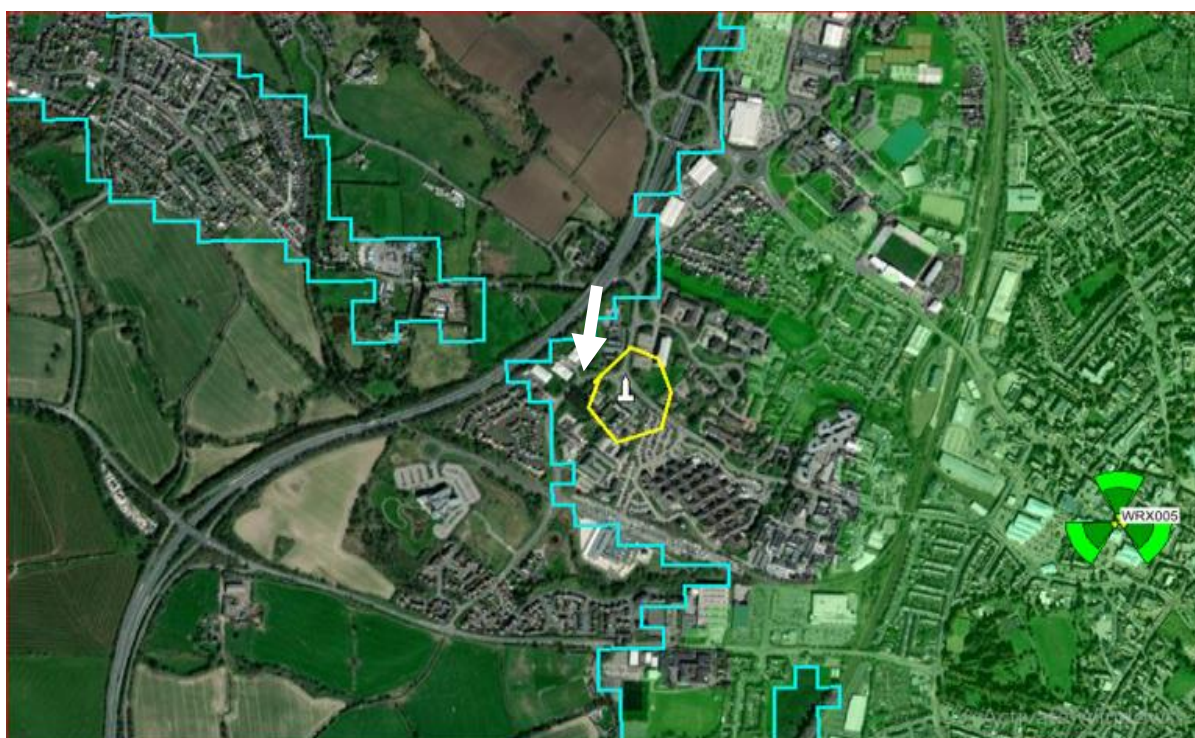
The proposed site is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the absolute minimum, which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is situated in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective, as set out in the planning analysis detailed herein.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area and existing CK Hutchison Networks (UK) Ltd sites are illustrated below:

Coverage Map: Proposed installation must be located close to the white marker –



Type of Structure

Description:

Proposed 'Slim line' Monopole with additional equipment cabinets and ancillary apparatus

Overall Height:	See drawings
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Height of existing building	N/A
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Equipment Housing:

Length:	See drawings
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Width:	See drawings
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Height:	See drawings
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Materials

Tower/mast etc. - type of material and external colour:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
The proposed installation is an Monopole which will support the UK Government Digital connectivity vision. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home – essential in these times of COVID-19 - as well as enjoying access to social, media and gaming for leisure time activities. The document Planning Policy Wales Edition 11 recognises that affordable, secure electronic communications infrastructure is essential to people and businesses. In designing the proposed installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practical. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree. In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The proposed development has two main elements, the monopole which would support the antennas, and the radio equipment cabinets located at ground level adjacent to the pole. A slim and unfussy design of support structure has been chosen to minimise impact on the surrounding area. The monopole design of support structure is considered suitable. In accordance with the requirement set within National Planning Policy Framework (December 2018) guidelines; which we consider to be a useful tool in respect of trying to accommodate new telecoms infrastructure as sympathetically as possible, the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture. The structure has an important function in terms of supporting the necessary telecommunications equipment. Furthermore, the radio antennas (housed within the pole) will transmit and receive radio signals to and from mobile handsets and other wireless devices. To operate efficiently, the radio antennas must be clear of obstructions such as buildings and trees, which is why the pole stands slightly above the surrounding properties. Nevertheless, every effort has been made to keep the height of the pole to an absolute minimum. It is also recognised that the Welsh Government acknowledge that digital infrastructure plays a pivotal role in maintaining the economic well-being of Wales. The overarching and relevant planning policy for modern telecommunications development is detailed within the document 'Planning Policy Wales' Edition 11. It details the importance, indeed necessity to the Welsh people and business of affordable, secure electronic communications infrastructure. It recognizes that modern society demands reliable fast and high capacity communication networks. It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact on the surrounding area. The design would result

in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations, and the impact of the development would be outweighed by significant public benefit of the proposal.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration (ICNIRP) attached ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.	Yes	
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5. Technical Justification

Reason(s) why site required
The site is required to provide new 5G coverage for CK Hutchison Networks (UK) Ltd, improving service in and around the area subject to the application.

6. Site Selection Process – alternative sites considered and not chosen.

Discounted Options
In accordance with the sequential approach outlined in the NPPF, which is considered to be good practice, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated. This sequential approach is outlined below: a) Mast and Site Sharing b) Existing Buildings Structures c) Ground Bases Installations In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.

Discounted Options:

Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A Street Pole with associated cabinets is deemed to be the only and most appropriate solution available.

As part of the site search and discounting of potentially suitable locations, the streets and properties were visited and for the reasons given discounted.

Discounts

Site	NGR	Discounted Reason
D1 – Croesnewydd Road Roundabout	332171, 350685	Nominal location - this location has been discounted to the location being on an island which would cause disruption during the build and maintenance.
D2 – Ellice Way	332324, 350789	This option has been discounted due to unsuitable grass verges at the location.
D3 – Ellice Way	332353, 350739	This option has been discounted due to unsuitable grass verges at the location.
D4 – Ellice Way	332208, 350847	This option has been discounted due to concerns around visibility splays which could affect motor users at this location.
D5 – Croesnewydd Road	332012, 350660	This location has been discounted due to the proximity of the entrance. Additionally, unsuitable grass verges and the narrow nature of the pavements at this location further discount this site as the pavement would not be able to accommodate a telecommunication installation.
D6 – Croesnewydd Road	332227, 350659	This option has been discounted due to unsuitable pavements and the presence of the existing street services.

Proposed Site Location: 100m DSA (Desired Search Area) shown circled.



7. Additional Relevant Information

Background to the Proposal

CK Hutchison Networks (UK) Ltd supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the area subject to this application.

The Welsh Government within the document Planning Policy Wales – Edition 11 also recognises that 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.

We also note the aspirations for communications in Welsh detailed within the Welsh Governments Mobile Action Plan dated October 2017.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

Planning Policy Relevant to the Development Site:

The Wrexham Unitary Local Plan 1996-2011 (Adopted 2015). Please note that the Wrexham are currently making a new local development plan.

No conflict is identified with the policies noted above, nor with any other aspect of the plan. An important community facility would be provided with enhanced 5G coverage to the area. A slim and unfussy design of pole is proposed, and there are trees close to the site to provide a degree of screening, keeping the impact of the development to an acceptable level. This site is considered to be the best, most suitable available location, with the significant constraints of a limited search area and predominantly residential area. Any site to provide coverage to the area would need to be within a residential setting.

The proposal therefore complies with mentioned policies and no conflict with any other aspect of the plan has been identified.

Overall, it is considered the proposal complies with both national and local policy. In terms of national policy, the proposal is sympathetically designed, and it would significantly enhance the provision of local community facilities and services and would protect amenity.

NATIONAL PLANNING POLICY GUIDANCE:

The document Planning Policy Wales Edition 11 February 2021 details the most recent Welsh Government policy guidance for making planning decision in respect of electronic communications.

Introduction

- 5.0.1 The Productive and Enterprising Places theme of planning policy topics covers economic development, physical infrastructure, energy and the efficient use of resources.
- 5.0.2 It includes the development of land necessary for economic activity, including traditional office and industrial development, rural enterprise and tourism, and the transport infrastructure and communication systems necessary to make those developments sustainable and work effectively. Our homes, businesses and communities need to be powered and heated by low carbon energy sources, which also includes reducing and optimising our use of energy within them. Use of non-renewable sources of energy will need to be curtailed if we are to meet our carbon reduction targets and international obligations on tackling the climate emergency. Finally, the use of the mineral resources necessary to build our infrastructure needs to be sustainably managed; as does the waste we generate from all our economic activity.

Economic Infrastructure

5.1 Context

- 5.1.1 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 delivers people to their place of work and home again. It enables goods manufactured here to be delivered to places around the world. 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.

5.2 Electronic Communications

- 5.2.1 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.
- 5.2.2 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.
- 5.2.3  The Welsh Government works with the telecommunications industry and the communications regulator Ofcom to share information on communications infrastructure, to understand regulatory, planning and economic issues which may influence investment and to inform future policy making in this area.
- 5.2.4 The provision of electronic telecommunications infrastructure is supported by extensive permitted development rights.
- Mobile Telecommunications^{43 44}**
- 5.2.5 Mobile telecommunications incorporates both mobile phone and mobile broadband technology and services. The planning system should help support

⁴³ See TAN 19: Telecommunications: <https://gov.wales/technical-advice-note-tan-19-telecommunications>

⁴⁴ Mobile phone network development: code of practice <https://gov.wales/mobile-phone-network-development-code-practice>

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.

- 5.2.6 The impact from new mobile telecommunications infrastructure will be the greatest in sensitive landscapes and other designated areas and should be carefully planned. However, it is these areas, which are mostly rural in nature, which are affected economically and socially by limited coverage. Proactive but considered planning is therefore essential to ensure greatest coverage whilst maintaining the character of these special areas.

- 5.2.7  Planning authorities should actively engage with mobile operators when preparing development plans to discuss service provision and identify where coverage is limited or is not being provided. The Welsh Government will work closely with planning authorities when, for example, it is pursuing initiatives or programmes aimed at improving digital telecommunications services and coverage across Wales.

- 5.2.8 Development plans should set out policies for telecommunications development, including criteria-based policies to guide development to suitable locations. Criteria should be sufficiently flexible to accommodate technical changes and may be concerned with the siting and appearance of apparatus, including location and landscaping requirements designed to minimise the impact on amenity consistent with operational requirements.

- 5.2.9  Planning authorities should not question the need for the telecommunications system nor seek to prevent competition between different operators.

- 5.2.10 New technologies such as 5G will result in the densification of mobile infrastructure particularly in urban areas which could require more small cell sites in street settings. The planning system will need to respond positively to this evolution in technology whilst being mindful of the impacts on amenity and the historic environment.

Efficient Use of Telecommunications Infrastructure

- 5.2.11 Mobile operators should share telecommunications masts where possible to ensure efficient use of infrastructure and to minimise environmental impact. In cases where masts of different operators are situated in close proximity to one another, the operators should justify this approach in their planning applications.

- 5.2.12 The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case, for example in designated or sensitive 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 and developers should engage with planning authorities and the community to identify possible locations that could bring additional benefits. 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.

- 5.2.13 As networks develop and technology changes, the re-use of existing sites is encouraged to minimise the need for new sites. Conditions should also be used to ensure that equipment that is no longer required or in use is removed promptly.

Sensitive Neighbouring Uses

5.2.14  Where a new mast is proposed on or near a sensitive use, for example an airport, hospital, crèche, school or college, it is important that operators engage with the owners and operators of the use early on in the development process to discuss any technical or other concerns the siting of a mast may cause. This will also include sites which may be in the proximity of military or other communication networks. Evidence of this engagement should be provided with all applications.

5.2.15 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 telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines.

5.2.16 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.

Fixed Line Broadband

5.2.17 Development proposals for new broadband infrastructure or improvements to existing networks or apparatus should be supported by planning authorities. New development proposals should include the provision of 'gigabit capable' broadband infrastructure from the outset, typically in the form of underground ducting on site, to enable broadband operators to connect easily to residents or businesses. 'Gigabit capable' will normally mean infrastructure suitable for fibre connectivity, but could also include fixed wireless infrastructure.

5.2.18 In rural areas, access to fast broadband is essential for both business and social purposes. The remoteness of some areas has proven a challenge to the establishment of modern networks. Current Welsh Government programmes are seeking to address these issues.

5.2.19  Planning authorities in urban and rural areas should include policies in their development plans to address the need for broadband infrastructure and its improvement or replacement. This should include design and locational criteria to aid the determination of planning applications. Planning authorities should liaise with broadband infrastructure providers to understand future programme requirements for rollout and improvement in their areas over the development plan period.

5.3 Transportation Infrastructure⁴⁵

5.3.1 The provision of sustainable transport infrastructure is essential in order to build prosperity, tackle the climate emergency, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being of Wales. The planning system should facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way which reduces the need to travel, particularly by private vehicles, and facilitates and increases the use of active and sustainable transport⁴⁶.

5.3.2  Planning authorities should support necessary transport infrastructure improvements, where it can be demonstrated that such measures are consistent with Welsh Government policy to encourage and increase use of sustainable transport and reduce reliance on the private car for daily journeys. Transport infrastructure should not generate significant demand for additional car movements or contribute

Planning Policy Wales (December 2018) (PPW)

PPW supports the provision of high-quality communications infrastructure. The relevant extracts are set out below:

Paragraph 5.2.1 states *“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.”* Paragraph 5.2.5 goes on to state *“Mobile telecommunications incorporates both mobile phone and mobile broadband technology services. 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 confirms that *“Planning authorities should not question the need for the telecommunications system or seek to prevent competition between different operators.”*

In terms of new 5G technology paragraph 5.2. 10 notes *“New technologies such as 5G will result in the densification of mobile infrastructure particularly in urban areas which could require more small cell sites in street setting. The planning system will need to respond positively to this evolution in technology whilst being mindful of the impacts on amenity and the historic environment.”* Finally, in respect of health aspects paragraphs 5.2.15 and 5.2.16 states *“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 telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines. 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.”*

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in Planning Policy Wales. The site is an infill site providing 4G and 5G coverage for CK Hutchison Networks (UK) Ltd and is compliant with ICNIRP guidelines.

Technical Advice Note 19: Telecommunications (2002)

This guidance is now rather dated; however, the document is still of relevance. Paragraph 46 deals with technical constraints and notes: *“Each telecommunications system has different antennas, siting needs and other characteristics. Planning authorities should have regard to any technical restraints 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.”*

Paragraph 56, dealing with environmental considerations states: *“Mast 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 those may be exactly the prominent locations that pose challenges to policies for the protection of high-quality landscapes and quality in urban areas... and the developer must demonstrate that there are no suitable alternate locations.”* In this case, it is important for

The proposal outlined within this document and the supporting enclosures, is in complete accordance with the guidance as set out in national guidance.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 24 of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019.

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Signed:	<u>7 Gullivan</u>	Date:	<u>12/05/23</u>
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