Planning Statement in respect to a
Prior Approval application on behalf
of Airband at NW201
CEFN ROAD
CEFINDRE
CAIA
WREXHAM
WALES
LL13 9NT

NGR: E: 335434 N: 350300



Telent Technology Services Limited

Rutland House

5 Allen Road

Livingston

West Lothian

EH54 6TQ

Table of Contents

1.0 Proposed Development 3
2.0 Planning Policy 7
3.0 Access 17
4.0 Regulatory Statement 18
5.0 Health and Safety 19
6.0 Conclusions 20

Rev	Originator	Date
	Name	Day/Month/Year
1	Becca West	19/08/2025

© Telent Technology Services Limited Group Town Planning. All rights reserved September 25. This document is expressly provided to and solely for the use of EE Ltd and must not be quoted from, referred to, used by or distributed to any other party without the prior consent of Telent Technology Services Limited Town Planning who accept no liability of whatsoever nature for any use by any other party.

P10

Introduction

This Design, Access and Supporting Statement has been prepared by Telent Technology Services on behalf of Airband Community Infrastructure Limited. The statement has been prepared in support of the application to install an 14m monopole and associated supporting apparatus on the highways land at Cefn Road, Cefindre, Caia Park, Wrexham, Wales, LL13 9NT.

In accordance with the Welsh Code of Best Practice on Mobile Phone Network Development and published Government guidance, this proposal was drawn up having regard to the need for good design. This statement sets out the most relevant considerations in respect of the proposed development. This provides context for the proposal, reasoning, technical justification and planning constraints, policy guidance and alternatives.

In particular:

- Considerations of design and layout are informed by the context, having regard not just to any immediate neighbouring buildings but the townscape and landscape of the wider locality. The local pattern of streets and spaces, building traditions, materials and ecology all help to determine the character and identity of the development.
- The scale, massing and height of proposed development have been considered in relation to that of adjoining buildings; the topography, the general pattern of heights in the area; and views, vistas, and landmarks.

The following general design principles have been taken into account in respect of this proposed telecommunications development:

- A proper assessment of the character of the area concerned.
- That the design shows an appreciation of context;

1.0 Proposed Development

1.1 The Site

The proposed 14m-high monopole and associated supporting apparatus will be located on the grass verge along Cefn Road, Cefindre, Caia Park, Wrexham, Wales, LL13 9NT.

The application site is located on the grass verge adjacent to a farmer's field along Cefn Road. It sits adjacent to a 30mph section of Cefn Road, a well-used thoroughfare within the area. The immediate surrounding comprises a mix of residential dwellings to the west and farmer's fields to the east. It resides on the edge of Wrexham's built up area, hence it's more rural location. There is a mix of existing transport and landscaped elements including kerblines, bollards, existing road signs, and lampposts

The grass verge is level with a footpath leading to the site. It is bounded by a kerb to the road edge and a hedge between the adjacent farmer's field. The location benefits from existing vertical street furniture, such as 8m high-lamppost, telegraph poles and a security CCTV camera mounted on a steel column. Cefn Road has an already well-established backdrop of vertically engineered elements and within the area, the addition of existing mature trees, varying in heights, offer partial visual screening to roadside features.

The proposed slimline monopole structure will be of a similar appearance to the existing street lighting columns in the area, and of these tall structures providing vertically engineered elements within the streetscene in which the proposed monopole will be viewed against, thereby not resulting in a prominent, or alien feature which would detract from the existing streetscape. Consideration is given to the existing highways infrastructure present on the around the area within the general landscape setting, all of which, provide good visual and utilitarian context against the mast which would be viewed within and not therefore considered as being visually incongruous within the surrounding residential setting.

This specific mast design is often utilised in rural areas to provide the technical requirements of fixed wireless broadband while meeting specific visual requirements of the local area. The height of the proposal, and the overall design of the monopole, have been kept to a minimum to ensure that any visual impact is reduced where practicable, the dishes and antenna are also designed to be as least visually intrusive while providing the required technical elements to benefit the local residents and area.

1.2 Technical Justification

Airband is an internet service provider that focuses on delivering superfast broadband to hard to reach and rural communities across England and Wales where a traditional fibre solution cannot be used. The purpose of the site is to enhance Airband's fixed wireless broadband (FWA) network and is part of a broader strategy to address connectivity gaps and support local economic, educational, and social needs.

Fixed Wireless broadband uses transmission masts or poles which house radios that communicate to smaller radio receivers at individual premises. Fixed Wireless broadband uses specific radio frequencies to transmit signals through the air (radio waves) without any

wires or cables, much the same method that mobile phone networks use. The network operates by relaying microwave signals via small radios fixed to unobtrusive masts, these are deliberately located to overcome physical barriers such as hills, trees or structures, transmitting the internet wirelessly over ground rather than underground cabling. The result is a low impact solution ideally suited to rural areas, National Parks and AONBs.

By using the fixed wireless technology, Airband has been able to provide speeds of 20Mbps to 1Gbps internet access where connections use radio signals rather than cables. This will benefit the local area providing residents the opportunity to access high speed broadband and provide local businesses with the technical enhancements to operate efficiently. In turn, it is apparent that any visual impact when compared with the numerous social and economic benefits will be greatly outweighed by the increased connectivity and coverage opportunities for the local area.

1.3 Application History

On searching the Council's online planning portal, there are no other known records of any planning applications or prior approval applications relating to telecommunications development at the application site.

1.4 The Proposal

The proposed development consists of the installation of:

- 14m-high monopole on root foundation with 8no. antennas, 1no. dishes and 1no. cabinet: plus ancillary development thereto.

The principal components of the proposed development are outlined in the Site-Specific Supplementary Information, and the general layout illustrated on the submitted drawings as part of this application.

1.4 Alternative Site Assessment

The information below contains details of the alternative sites that were investigated when searching for a viable location. These locations were assessed to ascertain whether they would provide the technical and operational requirements necessary for the surrounding area. The search area is particularly restricted by geographical and distance factors, with close proximity to the target coverage area of major importance. As you can see from the map below, there are no existing masts/sites, buildings or structures within the search area suitable to progress.

1) Ceiriog Road Junction - Cefn Road, Caia Park, Wrexham, Wales, LL13 9NW, NGR: 335424, 350333. Discounted due to being situated on right of the turning in and out of the farm posing a safety risk and impacting the visibility of vehicles passing or turning.

2) Grass Verge - Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335415, 350312. Discounted due to located nearer to residential dwellings and does not benefit from any screening from tree coverage.

3) Grass Verge along Cefn Road - Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335408, 350348. Discounted due to located nearer to residential dwellings and there is existing BT cabinets suggesting presence of utilities which may impact building the site.

4) Farmer's Field - Cefn Road, Caia Park, Wrexham, Wales, LL13 9NW, NGR: 335434, 350336. Discounted due to being located with the farmer's field due to concerns regarding maintenance, buildability and impacting a local business.

5) Cefn Road Grass Verge- Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335387, 350443. Discounted due to being located too far from the required search area and hence, would not provide the desired coverage.

6) Opposite 108 Cefn Road 0 Cefn RoadCaia Park, Wrexham, Wales, LL13 9HY, NGR: 335421, 350279. Discounted due to close proximity to a row of residential dwellings which would be in direct view of mast.

7) Farmer's Field 2 - Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335444, 350300. Discounted due to being located close to mature trees measuring 15m which would impact site's signal and not achieve the coverage required and would be located in accessway of field providing an obstruction to the landowner.

8) Cefn Park Verge - Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335429, 350204. Discounted due to the site's location falling outside the desired search area hence, not providing the desired coverage and in addition, close to residential properties.

9) Ceiriog Road - Cefn Road, Caia Park, Wrexham, Wales, LL13 9HY, NGR: 335378, 350316. Discounted to lack of mature trees for screening and within the housing estate making it too close to surrounding residential dwellings.



The image above shows the discounted options.

2.0 Planning Policy

This section sets out the most relevant national and local planning policy concerning the proposed development.

2.1 National Planning Guidance

National Policy & Additional Guidance

Future Wales – the National Plan 2040

The Overview section of the document set out the increasing importance of connectivity, stating *"We are an increasingly connected nation. In September 2019, 93% of homes and businesses had access to superfast broadband speed and 31% to ultrafast".*

This section also reflects on the Covid-19 pandemic noting "..There was a collective appreciation of the value of parks and green spaces, walking and cycling routes, local shops and amenities, and the cleaner air that emerged during the lockdown. The essential nature of good broadband and telecommunications connections to enable people to work from home, access services, and to stay in touch with one another has also been highlighted during this period. Good digital communications can have a positive effect on well-being."

Policy 13 is the most relevant specific policy to the proposed development:

'The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this. New developments should include the provision of Gigabit capable broadband infrastructure from the outset.'

The supporting text from the policy notes: "*The Welsh Government supports the roll-out of digital communications infrastructure across Wales. Modern, reliable mobile telecommunications and fast broadband services are essential to our everyday lives, as highlighted by the number of people working and learning from home during the COVID-19 pandemic. Digital communications infrastructure is crucial to the future success and economic competitiveness of Wales' businesses and supports community and individual needs, including access to key services and facilities."*

Planning Policy Wales 12 (February 2024)

Section 5.2 of the guidance deals specifically with Electronic Communications. The proposed development is supported by the guidance at paragraph 5.2.1 which 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 is essential for long term prosperity. Fast reliable connections are essential to meet the

needs of businesses and other organisations, and to those at home accessing digital services and working. Greater numbers of individuals working from home are a growing trend and planning authorities should consider the implications of this when preparing their development plans."

Paragraph 5.2.2 confirms the importance of the provision of quick and reliable networks: *"Modern society demands reliable fast and high-capacity communication networks to ensure large amounts of data can be easily accessed or exchanged."*

Specifically relating to mobile telecommunications Paragraph 5.2.5 states *"Mobile telecommunications incorporates both mobile phone and mobile broadband technology and services. The planning system should support telecommunications infrastructure where it is required, whilst taking in to account the status of protected and buildings as well as amenity considerations to protect what is valued most in our communities and environment."*

Paragraph 5.2.10 and 5.2.11 further explains *"Planning authorities should not question the need for the telecommunications system nor seek to prevent competition between different operators. Planning authorities may be able to assist mobile operators by identifying local authority owned land and property suitable for telecommunications development or by encouraging others to make sites available.*

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."

Under the 'efficient use of telecommunications infrastructure' sub section in paragraph 5.2.16 "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."

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

This advice document provides up to date information on network rollout. Within the Siting and Design section the document relates to 4G coverage stating:

"As technology has evolved, we have been able to do more and more with our mobile devices. Second generation (2G) technology gave us voice calls and text messages, and third generation (3G) gave us access to the internet and other data on the move. More recently, 4G brings superfast mobile broadband at speeds roughly equivalent to those you would expect from a fixed broadband connection."

Further goes onto state:

…the antenna systems will continue to provide 2G, 3G and 4G services that demand lower speeds. Consequently, there will be a requirement for greater numbers of antennas than before, as well as new radio equipment cabinets and taller structures. Furthermore, they will often be larger and so greater in appearance. In addition to the antennas, there will also be a

requirement for a greater range of ancillary apparatus to combine the different radio frequencies and help regulate signal and power loss between the radio equipment and the antennas themselves 4G and 5G are data driven technologies where high volumes of data are transferred between the base station and mobile phone handsets or other device. Each base station can only handle a particular amount of data traffic before it becomes saturated and the service fails."

The Siting and Design section also confirms:

"In addition, 4G and 5G use increasingly higher frequencies than previous generations. This is required because higher frequencies can transmit much higher volumes of data. However, the simple physics of radio waves means that the higher the frequency the lower the propagation in terms of distance. Higher frequencies also do not propagate through materials as well as lower frequency signals."

Technical constraints are noted resulting in a situation where*: "the MNO may need to put a base station within a commercial or industrial area and directly within the surrounding residential areas."*

Technical Advice Note 19 Telecommunications (August 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 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."*

Paragraph 56, dealing with environmental considerations states: *"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 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 alternative locations."*

Additional Guidance – Wales

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. 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 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.

Building Better Places: The Planning System Delivering Resilient and Brighter Futures: - Place Making and The COVID Recovery (Welsh Government July 2020)

This document sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the COVID-19 pandemic crisis. The planning system should be centre stage in the consideration of built and natural environmental issues that have arisen from this situation.

It notes that the pandemic crisis has highlighted the need for good quality places for people to live, work and relax in. It has further emphasised how important the quality of our living and working environments are and how much more they matter as we require more flexibility to support new working, living and learning needs.

The Government acknowledges that the COVID-19 crisis has emphasised the importance of considering health and well-being throughout the planning system to ensure communities across Wales are healthy, vibrant and inclusive.

The document sets out a number of priorities and actions for places post COVID-19. It states that in the immediate post COVID-19 phase there will be particular areas of policy which should be the focus of consideration and action, in order to act as a catalyst for a recovery across the pillars of sustainable development. They fall in to 3 categories:

- ‘How we experienced the direct impacts of the COVID-19 lockdown period and the permanent positive changes we need to see in places and as part of new development.

- The lessons we have learned over this time and how we can help to make places more resilient and adaptable to future pandemics, should they happen again.

- Aiding the recovery post pandemic and restrictions eased to ensure it benefits all parts of society and helps us to decarbonise, tackle climate change, reverse biodiversity decline and improve health and general well-being’.

The document identifies key issues which bring individual policy areas together to ensure that action is the most effective, inter alia:

‘Digital places – the lockdown lifeline’

The report goes on to state:

‘This is a once in a generation opportunity for planning to have a positive effect on the future wellbeing of people in Wales and these policy considerations should be applied immediately to ensure we affect change in the most positive way possible’.

The document expands on Digital Places and the lockdown lifeline. It acknowledges that staying connected through digital means was one of the few opportunities for social interaction with friends and family and has become mainstreamed as part of our working lives throughout the lockdown period. The quality of our mobile phone and broadband connections became linked to our emotional well-being in a way that many people had not appreciated before.

The report goes onto state that with homeworking now likely to be more prevalent across the country, having reliable and good quality communications systems in place is more important than ever before to help the economic and social recovery.

The Government document notes that the planning system can play a vital role in the position of electronic communications systems…new developments should provide sufficient infrastructure so that our homes and businesses can benefit from high quality service provision from occupation. The planning system can be used to influence the provision of new services in areas where current provision is poor. The document states that planning applications for new digital infrastructure should be recognised as essential to the COVID-19 recovery period and should be given priority for determination by planning authorities (emphasis added).

The publication goes on to note that the National Sustainable Place making outcomes are set out in PPW and are highly relevant at this time. This includes inter alia: Creating and Sustaining Communities – community based facilities and services; Growing Our Economy in a Sustainable Manner – Fosters economic activity, enables easy communication and embraces smart and innovative technology and Facilitating Accessible and Healthy Environments – minimises the need to travel, provides equality of access, feels safe and inclusive, good connections, convenient access to goods and services and promotes physical and mental health and well-being.

2020 Infrastructure Priorities set out in Wales (The Planner 2 December 2019)

The National Infrastructure Commission for Wales (NICW) has outlined energy, transport and digital communications as issues to focus on in 2020. The Infrastructure Plan is in its early stages, but decarbonisation, connectivity and resilience have been identified as themes that will run through the NICSs work.

It has found that 4G and 5G mobile broadband might be the lowest cost technology to provide superfast connections to some Welsh Households. A greater proportion of public funds should be allocated to mobile rather than fixed broadband. Julie James minister for housing and local government said *"developing infrastructure that contributes to growing our economy in a sustainable and responsible way is vital. Having declared a climate emergency earlier this year, we need to ensure our new infrastructure is fit for the long term – so that means considering low – carbon options. So I am pleased the Commission has set decarbonisation, connectivity and resilience as themes that will permeate its work".*

National infrastructure Commission for Wales Annual Report

The Foreword states 'this year we have shared the challenges presented by the COVID-19 pandemic. From March, when Wales went into lockdown, we have seen huge changes to everyday life. Some changes already underway have accelerated, such as the move to flexible working patterns. Other changes, such as the dramatic reduction in travel, were unexpected prior to COVID-19. Whether anticipated or not, many of the changes we have experienced will have an effect on the way we use, build and pay for infrastructure in the short term and perhaps for many years to come.

In respect of 'Digital' the Foreword states:

'Digital connectivity has been vital during the pandemic, enabling many of us to work from home, access services and maintain social contact. Those without good digital connectivity have been greatly disadvantaged. Alongside this report we publish our recommendations on Digital Communications Infrastructure in Wales'.

We have concluded that the evidence shows households and businesses stand to gain substantial economic benefits from both fibre to the home and 5G. The quality of these communications is critical in determining where new, high growth businesses locate and where young people choose to live.

They cannot afford to wait and will move to where fast, reliable broadband is available. Too many parts of Wales still lack adequate broadband connectivity and opportunities are already being lost'.

The report further states:

'Our plan for 2021 is to first engage with the Welsh Government and other stakeholders to ensure that the contents of the DCIW report are communicated and understood. Subsequent activities depend upon whether and when the Welsh Government decides to adopt some or

all of the recommendations in the report. This is a matter for the Welsh Government itself but the commission stands ready to assist in whatever way is most appropriate

2.2. Local Planning Policies

In terms of Local Plan Policies, by virtue of Section 70 of the Town & Country Planning Act 1990 (further enshrined in section 38(6) of the Planning and Compulsory Purchase Act 2004), development should be in accordance with development plan policies, unless material considerations indicate otherwise.

The relevant planning policy framework taken into consideration is found principally within:

- The Local Plan, which in this instance comprises;
  - Future Wales: the national plan 2040
  - Wrexham Unitary Development Plan 1996-2011 (adopted 2005)

Wrexham Unitary Development Plan 1996-2011 (adopted 2005)

The Wrexham Unitary Development Plan has a specific telecommunications policy to which this proposal will be considered.

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.

2.3 Planning Assessment

In consideration of the National and Local Plan, including the PPW and Policy CLF8, it is our belief that the development proposal meets the requirements of national and local policy whilst having regard to technical and operational factors and providing opportunities to improve broadband coverage to Wrexham. This supporting statement has justified the need for this proposal, and the installation of a 14m monopole to provide the fixed wireless infrastructure to provide residents access to high-speed broadband.

Government guidance states that in order to limit visual intrusion, the number of radio and telecommunication masts and the sites should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability should be encouraged. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate. The proposal fully complies with this Government guidance.

The site will stand smaller than the average streetworks pole measuring at 14m and is not dissimilar to the height of the existing vertical engineered structures in the vicinity of the proposed site including lampposts and telegraph poles. The slimline nature of the pole and small antennas appear to blend into the existing streetscene. By comparison, the site in a number of elements is smaller and less visually intrusive than a standard monopole used for 5G with a wider pole, more cabinets and larger, shrouded antennas.

In terms of siting, the requirement for this site has been identified to fill a gap in coverage allowing rural communities of Wrexham to access high-speed broadband. As such, the need for this monopole to be sited within this area so as to ensure that customers and residents can be best serviced and well connected. It is considered that this proposal would provide coverage to many customers; not to mention those working within the immediate and surrounding area.

The application site has been carefully considered. To this end, the equipment has been located on highways land in a break of the residential nature of the area and with the backdrop of farmer's field. There are a number of trees within the immediate area which will help partially shield the installation from certain vantage points. This will help reduce any harm as such less than substantial and would be outweighed by the significant public and social economic benefits. Consequently, the visual impact of the proposed radio base station will be minimised within the area. This is in full accordance with the aspirations of policy CLF8 of the Local Development Plan.

For the site to be fit for purpose, the antennas must have a clear line of sight, so the site has been designed with the antennas projecting over any buildings and surrounding trees so as to provide the necessary coverage that local residents are demanding and require. It is considered that the proposal would not be the least visually intrusive addition to the wider public area, whilst achieving the technical requirements of deploying telecommunications equipment in this area. While there will always be a degree of visual impact as a result of any form of development, the accompanying visualisations provided in support of this application show that the main visual impact will be immediately facing the site, whilst from residential properties the majority of the installation would be screened by intervening buildings and trees as such with top of the lattice tower being visible, however as noted it is a requirement to have the installation be visible to reach line of sight and connect within the operators network.

The scale and design of the telecommunications tower will not detract from the local character given its careful siting adjacent the mature tree belt that has trees rise to 15m, which will provide some level of screening or backdrop (depending on the direction of view) and provide a natural vertical context for the proposed site. This ensures impact upon the area has been minimised, so far as is practicable.

We believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental and visual impacts through careful sitting and design choices in conjunction with the see through nature of the lattice tower design allowing light to pass through and the backdrop to be visible to a certain extent. This is in full accordance with the aspirations of the National and Local planning policies.

Therefore, it is our belief that the wider public benefit in this instance vastly outstrips any perceived visual intrusion and it is our belief that as such locals and associated stakeholders within the council should support this application because of the distinct lack of impact on the wider area whilst according to the policies mentioned within this document that present greater and wider opportunities for locals in this area.

Furthermore, while located in close proximity to nearby mature trees to ensure some degree of context, the site location is well out with the RPA for these trees and would not have any resultant impact on them. No trees will be removed or require any works in order to accommodate the proposal in this instance, and it is not considered that any tree survey would therefore be required in support of this proposal and site location.

The operator's equipment cabinets are smaller than those of other statutory undertakers which are commonplace in this area including BT Openreach. Their limited height and scale will ensure that these cabinets will not be detrimental to the visual amenity of the area and will be finished in Fir Green (RAL6009).

The proposed location is not within in any designated land areas and is not located near any listed buildings. Hence, the proposed location is ideal for the purpose of the equipment.

In line with the requirements of PPW there are no existing telecommunications installations for the operator to share that are viable, that would provide the necessary coverage to the target coverage area. Similarly, there are no buildings which are suitable and available that the operator could utilise to operate and host their equipment.

It is accepted that the height of the proposed installation is taller than other pieces of surrounding structures, but this in itself is not a valid reason to conclude that it is not appropriate at a specific location. Indeed, Inspectors at appeal have noted that by their very nature to be effective masts are required to be taller than surrounding structures.

We would again reiterate that we believe that we have demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental and visual impacts through careful sitting and design choices. The proposal complies with both national and local planning guidance and as such it is considered to provide the best location from both a technical and town planning point of view.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this planning application. As noted below, an ICNIRP certificate has also been enclosed. We are of the opinion that this

proposal is compliant with all relevant planning policy, as noted above, and could therefore be supported by your department.

3.0 Access

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only. In principle, no access to the cabinets or the mast is allowed and as such access requirements are not considered an issue.

3.1 Construction and Maintenance

Access to the site will be taken directly via Cefn Road. Maintenance visits will be conducted as required. Consequently, it is not envisaged that access to the site would cause traffic management or other issues. During the construction process all build, and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

It should be noted that the install of the equipment will be as per the latest NJUG guidelines which will of course consider the proximity of trees in the site area

3.2 Public Access

Radio base stations are not designed to be accessible by the public. The equipment cabinets would always be locked and only accessible by authorised persons. Therefore, no specific public access provisions are required to be incorporated into the design of the proposal.

4.0 Regulatory Statement

Airband is authorised to operate a public electronic communications network and supply public electronic communications services under the provisions of the Telecommunications Act 1984, the Communications Act 2003 and the Electronic Communications Code (Conditions and Restrictions) Regulations 2003 and aims to meet all reasonable customer demand for that service.

OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst most of the UK now benefits from mobile coverage there are still spots without coverage. Therefore, the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate evidence.

The development proposed is to provide improved broadband connectivity to the users within this area of Wrexham.

5.0 Health and Safety

Telecommunications planning guidance states that it is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime as it is a matter for the Health and Safety Executive. The Government guidelines state that provided a proposed base station meets the ICNIRP guidelines for public exposure, then it should not be necessary for the local planning authority to consider the impacts of health concerns.

It is confirmed that the proposed equipment and installation complies with ICNIRP guidelines and a Declaration of Conformity has been submitted in support of the application.

6.0 Conclusions

As part of their commitment to support the BDUK initiative to bring fast and reliable broadband and mobile coverage to hard-to-reach places across the UK, Airband propose to provide fast and reliable mobile and broadband coverage in this area which will provide improved data services to customers.

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure with an overall height of 14 meters is needed in this locality because of the surrounding clutter. Consideration has been given to the design of the mast and this is reflected in the slimline monopole design

In relation to planning policy, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable. Therefore, the development of a new mast site is justified, and it has been demonstrated that it has been sited and designed to minimise its visual impact and all other environmental impacts as far as practicable in accordance with Policy CLF8 of the adopted Wrexham Local Plan.

The Council are therefore respectfully asked to approve its siting and appearance, in the event that they consider such prior approval is required.