**Our ref: COL.MOD.UK.0010005_1 - CEFN MAWR**

**The Chief Planning Officer**
**Wrexham County Borough Council**
**Wrexham Library,**
**Rhosddu Road,**
**Wrexham,**
**LL11 1AU**

**Date: 22nd July 2026**

Dear Sir

**EE Ltd**

**Submission of an Application for a Prior Approval Determination**

**Proposed Alterations to Existing Base Station installation at Cefn Mawr, Pen - Y - Graig, Froncysyllte, Llangollen, Wrexham, LL20 7RT, NGR E: 326782 N: 340926.**

On behalf of EE Ltd we submit herewith an application for a prior approval determination for the upgrade of the existing electronic communications installation at the above site. This application follows the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

The application is submitted in accordance with the requirements of Part 24 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (as amended) and seeks a determination as to whether the Authority's approval will be required for the siting and appearance of the development.

The application comprises:

i. The written description of the development: installation of a new 10kVA generator on new concrete foundation. PSU cabinet to be installed. Earth pit to be installed. AMF panel to be installed on new gentry pole fixed to concrete base. Power duct to be installed from source to genny. Cable tray to be installed. Redundant cabinets to be removed.

ii. An O.S. site plan scale (1:2500) drawing number 004 showing the location where the apparatus will be installed

iii. Electronic payment of £758.00 in respect of the application fee

iv. The Developer's Notice served on the landowner

v. The Developer's contact details

The following information is also provided to assist with your determination of the application:

vi. The Authority's 1APP form for telecommunications development prior approval applications

vii. Drawing reference numbers – 100 and 150 – providing further details of the siting, layout and design of the development

viii. A letter issued by the Home Office dated 14 March 2025

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.

**Developer's Contact Details**

All correspondence and queries relating the determination of this application should be submitted to the undersigned.

However, in accordance with the requirements of The Town and Country Planning (General Permitted Development) Order 1995 (as amended) any correspondence to the developers should be sent to:

For Cellnex UK:

Email: planning@cellnextelecom.co.uk

For EE Ltd:

Email: public.affairs@ee.co.uk

**The Scope of the Prior Approval Determination**

The permitted development rights granted by Part 24 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (as amended) (the GPDO), exist to facilitate the establishment of modern communications apparatus and infrastructure judged by successive governments to be important to a modern economy and in attaining sustainability objectives.

The permitted development granted subject to the prior approval procedure is similar to the grant of outline planning permission, with details of precise siting and appearance being reserved.

As a consequence, the scope of determination does not extend to whether the site selected is needed, as the development is acceptable in principle due to the rights conveyed by the GPDO. Likewise, whilst information on alternative sites may be supplied by way of background and context, the extent of control on siting is limited to the precise siting on a site and not the general location.

As the principle of development at the application site is permitted by the GPDO, this support letter focuses on the statutory criteria of detailed siting and appearance. In so doing, this is considered against current town and country planning guidance, including the development plan which are material considerations, and with reference to the operational requirements of the operator and the attempts to accommodate the particular requirement.

**The Proposed Development**

In partnership with Government departments and other partners, the Home Office is replacing Airwave TETRA, the current communications system used by the Emergency Services, with a new system called the Emergency Services Network (ESN). ESN is a critical voice and broadband data communication system running over mobile network. A key requirement of ESN is that it continues to provide coverage for the three emergency services when the service is impacted by events such as power outages, storm damage or vandalism. The Emergency Services Mobile Communications Programme is responsible for delivering ESN for the three emergency services of Fire, Police and Ambulance and to achieve this EE have been instructed to install a new permanent back-up power generator across a portfolio of sites.

The development as proposed comprises:

The proposed works comprise the installation of a new 10kVA generator on a new concrete foundation, together with a new PSU cabinet and earth pit. An AMF panel will be mounted on a new gantry pole fixed to a concrete base. New power ducting will be installed between the power source and generator, along with an associated cable tray. Existing redundant cabinets will be removed from the site.

The emergency services communications network needs to be operational on a continuous basis and therefore it is essential that the site benefits from an emergency ‘back up’ power supply in case the main grid power supply to the site fails. In practice therefore the back-up generator will only be needed in an emergency situation for example if the existing high-power supply to the site is lost.

This minor proposal will provide a back-up emergency power supply for the Emergency Services network and will therefore support the efficiency of the Emergency Services by allowing them to maintain access to the latest type of data and applications as part of the EE Ltd service provided to the wider area.

In keeping with the Planning Policy Wales (Edition 12) and the Code of Best Practice on Mobile Phone Network Development (2021) guidelines, in this instance, the proposal is for the upgrade of an existing telecommunications site. The application site has hosted a telecommunications site for a number of years. The proposal will ensure that power resilience is achieved at this site so that the area does not suffer a catastrophic loss of Emergency Services Network and the EE public coverage in the event of a mains power outage.

The proposed generator is the minimum requirement to achieve the required power resilience. It will be located within the existing fenced compound alongside the existing equipment cabinets.

The proposal is for the upgrade of an existing site and as such, no alternative site options were investigated. There is a specific requirement to upgrade the existing site as it is the only site in the appropriate location to provide coverage to the wider area, and the upgrade is required to provide power resilience.

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

**Compliance with Planning Policy and Guidance**

In accordance with the Code of Best Practice on Mobile Phone Network Development, (2021) and published Government guidance within the Planning Policy Wales (Edition 12), this proposal has been developed having regard to the need for good design.

The Welsh Government attaches great importance to the design of the built environment and outlines this within Section 3 (para. 3.3) of Planning Policy Wales. It states, " Good design is fundamental to creating sustainable places where people want to live, work and socialise." In keeping with Planning Policy Wales, guidelines for using electronic communications, the proposed design has been selected to minimise any visual impact upon the designated landscape in which the site is located.

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

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

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.

The principle of a telecommunications base station installation in this location has already been accepted by your Authority, and it has become an established feature within the landscape.

The Government fully supports high quality communications infrastructure. Planning Policy Wales states at paragraph 5.2.5 that the planning system should 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.

The special operational and technical factors that require specific siting of base stations should be balanced by the need to minimise environmental and visual impact, and the special qualities of nationally important landscapes such as National Parks and National Landscapes (formerly AONB). In keeping with Planning Policy Wales, the proposed design has been selected to minimise any visual impact upon this designated landscape.

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 development as proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

**Local Policy Considerations**

The proposed development has been assessed against Policy CLF8 (Telecommunications) of the Wrexham Unitary Development Plan 1996 - 2011. The proposal comprises the installation of a permanent backup generator.

*"Policy CLF8 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."*

In accordance with Policy CLF8, the proposal is confined to the established site and makes use of the existing telecommunications compound. The development does not require the provision of a new mast or an alternative site and therefore accords with the sequential approach set out in Policy CLF8.

The siting of the equipment within the existing compound ensures that impacts on the surrounding landscape and townscape are minimised. The development is of a modest scale and will be viewed in the context of the existing telecommunications infrastructure already present on site. Furthermore, the removal of redundant cabinets will assist in reducing visual clutter within the compound. As such, the proposal is considered to satisfy the requirements of Policy CLF8 regarding siting and mitigation of visual impact.

The proposal is also supported by the objectives of Future Wales: The National Plan 2040, which recognises the importance of high-quality digital infrastructure to Wales economic and social wellbeing. Future Wales supports the delivery, maintenance and upgrading of telecommunications infrastructure and encourages planning authorities and operators to work collaboratively to facilitate improved digital connectivity. The proposed development will help maintain a resilient and reliable telecommunications network, supporting the continued provision of modern mobile communications services in accordance with national planning policy.

The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator and minimising environmental impact.

The electronic communications site with the addition of the proposed development will continue to comply with the relevant ICNIRP guidelines on public exposure. A certificate confirming ICNIRP compliance is provided with this application.

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

Finally, your attention is drawn to the 56 days statutory time period associated with an application of this nature upon which detailed advice is given at paragraph 93 onwards of the Welsh Code of Best Practice.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact me Caitlyn Richmond (WHP Telecoms Ltd).

Yours faithfully

