

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	DYFFRYN ISAF NORTH	Site Address:	DYFFRYN ISAF FARM, LLANBRADACH, CAERPHILLY, CF83 3DY
National Grid Reference:	315265, 190017		
Site Ref Number:	12555525	Site Type: ¹	MACRO

2. The Proposal

Brief summary of the proposal:

Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage, and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to:

- promote shared infrastructure
- maximise opportunities to consolidate the number of base stations
- significantly reduce the environmental impact of network development

Cornerstone is in the process of progressing an upgrade to an existing site within the area to ensure the inclusion of all technologies which will significantly improve service provision for Vodafone Limited, ensuring that the most up to date service provision is provided in this area.

There is a specific requirement for a radio base station upgrade at this location to provide improved coverage to the area.

This application seeks consent for the following development:

The removal of the existing 15m mast supporting 4 no. antennas and its replacement with a 30m mast supporting 2 no. relocated antennas, 2 no. new antennas, 1 no. 300mm relocated dish and ancillary equipment; the removal of the existing equipment cabin and the installation of 2 no. equipment cabinets

¹ Macro or Micro

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 Registered in England & Wales No. 08087551.
 VAT No. GB142 8555 06

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on the new tower foundation within the existing compound and development works thereto.

The proposed works relate to an existing telecommunications site located on the corner of a grass field at Dyffryn Isaf Farm, within a well screened area of Llancredach. The area is rural in nature with grass fields and Mynydd Dimlaith to the east beyond Pandymawr Road. The site is tucked within a belt of mature trees. To the north there is Dyffryn Isaf Farm; however, good separation distance has been retained from the houses to the north and their views are obscured by the intervening vegetation. The views from A469 are well screened by the established vegetation along the road. The mast is located within the area it is designed to serve in a location where it is not directly adjacent any houses and benefits from the rural nature of the area. This location benefits from an abundance of trees and natural vegetation close to the site and in the wider area.

The proposed location is shown below:



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3. Pre-Application Check List

Site selection:

Was the industry site database checked for suitable sites by the operator?	Yes	No
If no explain why: N/A		

Annual area wide information to planning authority

Can the annual area wide information be provided on request?	Yes	No
<p>If no explain why:</p> <p>Cornerstone's commercial relationship with Vodafone has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer has visibility of Vodafone's full update plan. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance.</p> <p>Cornerstone aims to engage and work with the planning department at the earliest opportunity from when it is instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans, then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.</p>		

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Pre-application consultation with planning authority

Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	N/A
Summary of outcome/Main issues raised:	
<p>Pre-application correspondence was sent to Caerphilly County Borough Council by email on 1st December 2023.</p> <p>An acknowledgement letter has been received on 1st December 2023. No further comments received.</p>	

Stakeholder Consultation

Outline consultation carried out:
<p>Pre-application correspondence including a covering letter and proposed plans were emailed to the following community groups on 1st December 2023:</p> <ul style="list-style-type: none"> • Bedwas and Trethomas Ward Councillors: Jill Winslade, Elizabeth M. Aldworth and Lisa Phipps • Bedwas, Trethomas and Machen Community Council • Wayne David MP
Summary of outcome and main issues raised:
<p>No responses have been received to date.</p>

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Schools/Colleges

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

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

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

Developer's Notice (only required for an application for prior approval)

Copy of Developer's Notice enclosed?	Yes	No
Date served:	Full Planning application – N/A	

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4. Pre-Application Check List

Type of Structure (e.g. tower, mast, etc):	
Description:	
The removal of the existing 15m mast supporting 4 no. antennas and its replacement with a 30m mast supporting 2 no. relocated antennas, 2 no. new antennas, 1 no. 300mm relocated dish and ancillary equipment; the removal of the existing equipment cabin and the installation of 2 no. equipment cabinets on the new tower foundation within the existing compound and development works thereto.	
Overall Height:	30.19 Metres (to top of antennas)
Height of existing building (where applicable):	N/A
Equipment Housing: PSC cabinet	
Length:	0.823 Metres
Width:	0.640 Metres
Height:	1.721 Metres
Equipment Housing: BTS3900AL cabinet	
Length:	0.770 Metres
Width:	0.750 Metres
Height:	1.925 Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Lattice tower – galvanised metal
Equipment housing – type of material and external colour:	Cabinets – steel - grey

Application Background:
<p>An existing telecommunications site has been identified within Dyffryn Isaf Farm's grounds; however, the current equipment cannot accommodate the operator's latest requirements due to technical constraints which exist.</p> <p>A replacement, sturdier and higher installation is therefore required to accommodate the upgraded equipment. The design is a lattice tower as is already in place. The amendments proposed seek to increase the height of the installation from 15m to 30m whilst retaining the current location within the fenced compound, however, slightly relocated centrally within the compound. The existing 2 no. antennas will be removed and replaced with 2 no. new antennas, and 2 no. existing antennas will be relocated on the new tower. The existing microwave dish will be relocated on the</p>

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new tower under the antennas. The replacement antennas and ancillary equipment are needed to provide the required level of coverage to the area. The existing equipment cabin will be removed to make room for the new tower. 2no. new cabinets will be mounted within the fenced compound onto the new tower foundation. This design continues to be the most appropriate for this location as it is capable of supporting the amount of equipment required. This design is preferable in this rural location.

Design Statement

The replacement and upgrading of an existing installation is in accordance with the sequential approach to site selection criteria set out within the Code of Best Practice on Mobile Phone Network Development for Wales (2021) and is encouraged within the National Planning Policy Framework (2021) over the development of a, separate, new telecommunications site.

An installation is generally made up of the following components:

- The mast itself – i.e. a lattice tower
- Antennas and dishes
- Associated ancillary equipment
- Cabinets or equipment cabin
- Power – mains and /or generator.

In line with Planning Policy Wales 11 and the Code of Best Practice, the operator has carefully considered the design of the proposed upgraded site. Design justification is provided below.

Mast

The design is a lattice tower as is already in place. A lattice tower has been selected over other available designs, this is because it is able to provide greater coverage (by allowing for better positioning/orientation of the antennas), is structurally capable of supporting the size and weight of equipment and providing the height required by all operator and is of a similar design as the existing which will help to reduce visual prominence. The lattice tower is a relatively lightweight structure which allows for filter views through the installation.

It is acknowledged that the proposed mast is of a slightly larger form and scale than the existing. This is as a result of modern equipment being heavier than previous telecoms equipment and requiring a stronger, higher and wider, installation to accommodate it. In terms of the height of the proposed structure, a height increase

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is required within this application bringing the installation from 15m to 30.19m. This is required to ensure that antennas and dishes are able to over-sail surrounding vegetation (trees surrounding the site varies in heights from 14m to 23m) providing improved coverage and connectivity to the area and enabling the required coverage to reach the required extent of the target area.

The design and type of equipment to be deployed in this case has been chosen specifically to take account of and minimise the impact of the installation on the locality. The mast will appear slightly bulkier due to the differences between the existing tower and new more robust tower; however, the installation will not appear significantly different from the structure already in place being of a lattice tower and the tapering of the mast will ensure less impact on the more visible upper section.

The colour of the mast is proposed to be grey. However, it can be coloured any other colour that the planning authority considers appropriate.

Antennas, dishes and associated ancillary equipment.

The new antennas are a similar size as the existing and will be mounted on the new tower. The relocated dish will be mounted under the antennas on the tower leg. Associated ancillary equipment is proposed below the antennas. This equipment is generally small and is designed to make the antennas more efficient, allowing the amount of ground based equipment cabinets to be reduced and ensuring that a simple design solution can be proposed. The antennas are proportionate in scale to the mast and will not be overly prominent. The proposed design will ensure that the upgraded site will not appear significantly different from the installation which currently exists.

At the moment the antennas are lower than the trees to the north and east which prevents effective radio frequency propagation to the surrounding area, even for 3G and 4G frequencies. To ensure coverage to a wider area, and account for technical constraints for 5G propagation, the antennas need to be more elevated and require the height of the mast to be increased as here proposed.

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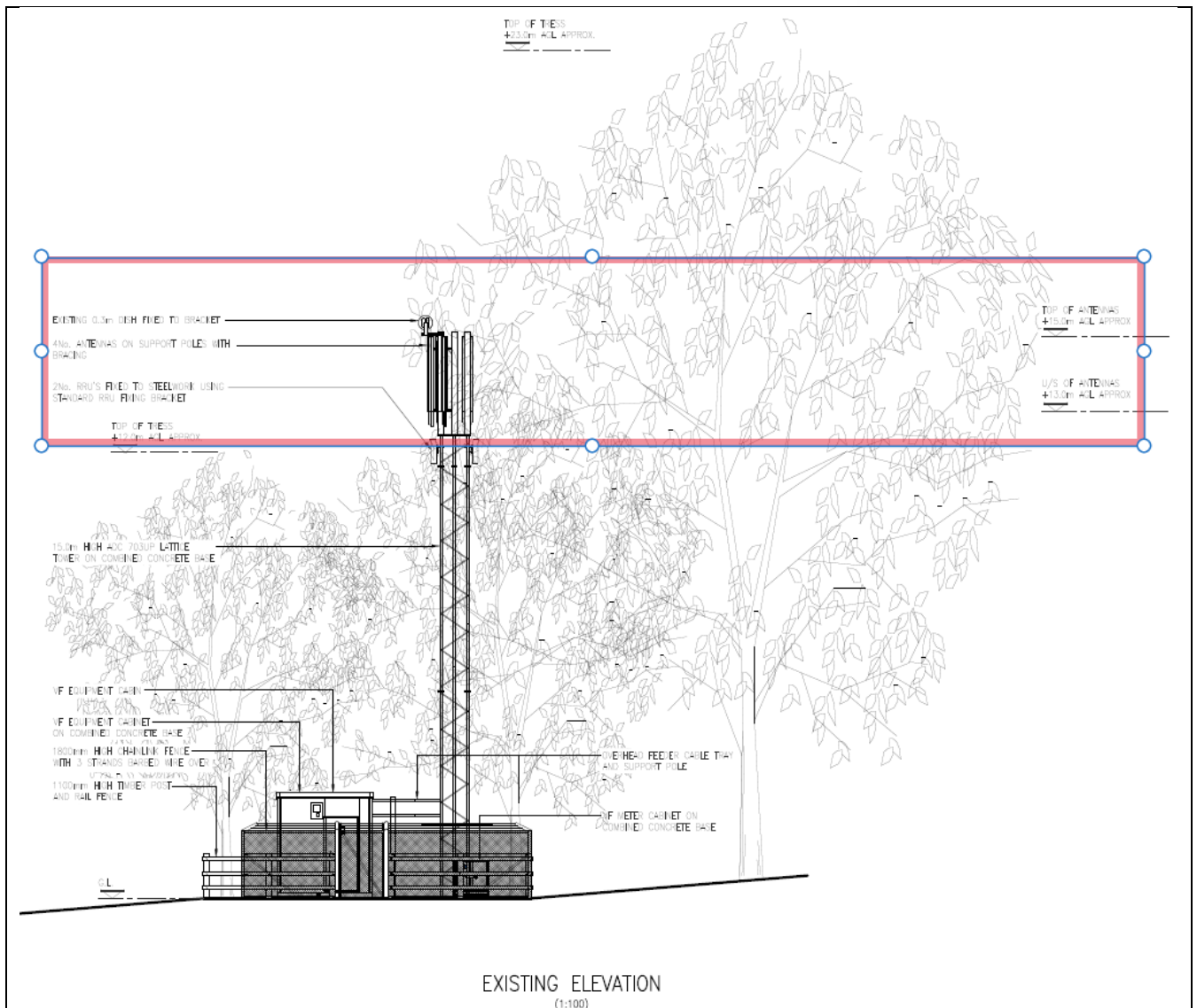
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A taller mast is therefore required to allow effective coverage to be provided by the upgraded installation.

The proposed height is informed by technical data – including the area the mast is required to cover – and selected following an on-site design visit with a specialist team. The height selected is essential for the operator's equipment to reach the target coverage area. This height is chosen taking into account variations in land levels / topography, heights of existing vegetation and built form which can interrupt the transmission of different technologies and frequencies. The operator's antennas must be able to rise above any obstruction within the environment and their dishes must also have a clear line of site to other dishes in the network to form a link. The minimum height has been selected to ensure that the operator's antennas and equipment are free from interruption and can provide the required coverage to the

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target areas. Modern antennas are more susceptible to clipping / interruption which is why a slight height increase is required.

Equipment Cabinets

The equipment cabinets are designed to appear like other statutory undertakers' equipment cabinets. The size of the cabinets has been dictated by technical requirements to support the mast and antennas however the number of cabinets has been kept to a technical minimum. The existing equipment cabinet will be removed and 2 new cabinets are proposed to be coloured grey and will be located within the site compound in proximity to the mast. They are proportionate in size, will be read in the context of the mast and will be understood as functional infrastructure associated with telecommunications development.

Power

Power is a permanent supply as currently existing.

Fenced compound

The existing 1.8m high fence will be retained.

Access

Access will be along the existing track as shown on accompanying plan 100/A.

In all aspects of the design the smallest practical components have been utilised to ensure that the visual impact of the development is kept to a minimum and to streamline the design as much as possible.

It should be noted that telecommunications development is subject to a number of technical constraints and that the selected design has been chosen to balance both the technical requirements of the operator and technical performance, with the planning considerations and impact on visual amenity.

The proposed design mean that the installation will be more visually prominent. Notwithstanding this, the upgraded installation will be viewed in the context of the existing and benefits from being located within a rural area with well-established tree screening and away from residential amenity.

When weighed against the benefits of providing improved coverage to the locality, weight should be given to the provision of improved network coverage to this area of Caerphilly.

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Summary

It is therefore considered that the proposal before you strike a good balance between environmental impact and operational considerations. The installation has been designed to be read in the same context as the existing equipment, so as to limit visual impact so far as technically possible whilst still working within the technical design constraints of delivering the latest technologies.

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

A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout program is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

There is a specific requirement to upgrade the existing radio base station at this location to enable enhanced 2G and 4G coverage and capacity for Vodafone to this area. This ensures customers are able to continue to use their handheld devices for the purposes in which they have become accustomed, whilst on the move, as demands on the system for greater capacity augment as more customers access the data on the operators' network.

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

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Reason site chosen:

The site has been selected following a physical search of the area and industry databases and is considered to be the most suitable option in technical terms whilst also balancing planning considerations.

As part of Vodafone's continued network improvement program, there is a specific requirement for a radio base station upgrade at the above location to provide enhanced connectivity to the area. An existing telecommunications site has been identified; however the current equipment cannot accommodate the operator's latest requirements. As such, the equipment needs to be replaced in order to implement this upgrade to the operator's service.

The applicant has taken a sequential approach to development and is seeking to upgrade the existing established telecommunications site as opposed to the creation of a new site.

This is an existing telecommunications site located on the corner of a grass field at Dyffryn Isaf Farm adjacent Pandymawr Road which waves on the western side of Mynydd Dimlaith. There is an abundance of trees and vegetation close to the site which help the installation to blend into the surroundings. The views from A469 and Pandymawr Road are obscured by the well-established vegetation.

This upgrade works offers a means of balancing the technical needs of the operator against those of the local community and local planning authority and is considered to be the best approach to deliver the required coverage, whilst balancing all of the above needs.

Whilst the proposed development would result in a change to visual outlook, it is considered that the impact would not be unacceptable when considered in the context of the existing site and acceptance of telecommunications development in this location. Upgrading existing sites is in accordance with both the Code of practice for wireless network development in Wales (2021) and the PPW (2021), which aim to ensure that the number of installations is kept to a minimum.

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Planning Policy Framework/Development Plan Policy

Assessment of site/proposal in relation to Government guidance and planning policy

Relevant Planning Policy

- Town and Country Planning (General Permitted Development) Order 1995 (as amended) - Part 24, Schedule 2 – Development by Electronic Communications Code Operators (Wales)
- Future Wales – the National Plan 2040 (2021)
- Planning Policy Wales 11 (2021)
- Code of Best Practice on Mobile Phone Network Development for Wales (2021)
- Technical Advice Note 19: Telecommunications (2002)
- Caerphilly County Borough Local Development Plan up to 2021 (adopted November 2010) – Policy SP7 – Planning obligations.
- Caerphilly Regeneration Strategy 2018-2023 – A Foundation for Success & Delivering Prosperity after Covid

Other relevant documents:

- Mobile Action Plan – Welsh Government (October 2017).
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures: - Place Making and The COVID Recovery (Welsh Government July 2020)

Future Wales – the National Plan 2040

The background for this new policy document is set out in the introduction – “Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving the health and well-being of our communities.

Future Wales is a spatial plan, which means it sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people. Future Wales sets the challenge of delivering these improvements to the

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public, private and third sectors. It makes clear the importance of planning new infrastructure and development in such a way that they are complementary rather than competing priorities, ensuring opportunities are maximised and multiple benefits are achieved."

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" (page 40).

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" (page 48).

Policies 13 and 14 are most relevant specific policies to the proposed development:

- **“Policy 13 – Supporting Digital Communications** - 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.
- **Policy 14 – Planning in Mobile Action Zones** - The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings. The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage. The Welsh Government, planning authorities and mobile telecommunications operators must work together to achieve increases in mobile coverage within Mobile Action Zones."

There is a requirement to provide upgraded equipment in this location to accommodate increased network demands, provide modern technologies and allow for continued consistent Vodafone coverage to be provided to this area of Caerphilly. Thus, whilst the Mobile Action Zones have yet to be identified, the proposed installation meets the essence of Policy 14 and its aspiration to provide good quality mobile connectivity to areas where coverage is poor.

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Planning Policy Wales 11 (February 2021) (PPW)

Relevant extracts of this guidance are set out below:

Paragraph 3.61 (Supporting Infrastructure) states “Adequate and efficient infrastructure, including services such as education and health facilities along with transport, water supply, sewers, sustainable waste management, electricity and gas (the utilities) and telecommunications, is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them.”

In terms of economic infrastructure **paragraph 5.1.1** states “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.”

Section 5.2 deals with Electronic Communications. The following extracts are relevant:

“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” (Para 5.2.1).

“Modern society demands reliable fast and high capacity communication networks to ensure large amounts of data can be easily accessed or exchanged” (Para 5.2.2).

“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” (Para 5.2.6).

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The proposal outlined within this document and the supporting enclosures, accords with the guidance as set out in Planning Policy Wales. The site will ensure coverage is maintained and it will provide enhanced coverage to the surrounding area, providing fast and high-capacity services to the area. It is a rural site and is outside any designated areas, to ensure impact is minimised as far as practicable. It is located within the area it is required to serve yet in a location which will largely shield the area from view due to the abundance of mature vegetation.

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, 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:

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Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

Sinclair Dalby Limited, 3 Princes Street, Bath, BA1 1HL

Registered Office, Sinclair Dalby Limited, 11 Windell Street, Bath, Somerset, BA2 5BG. Registered in England 7610197.

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1530 Arlington Business Park,
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- *'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 well-being 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 on to 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 proposed radio base station will be a lifeline for those wanting to work more flexibly and just to go about a more modern way of living and keeping in touch more easily with friends, family and work colleagues.

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 proposed upgrade will expand the electronic communications network into this rural area and augment existing coverage to a significant extent for Vodafone.

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 amongst other things: 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.

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

The latest version of the Code of Best Practice on mobile phone network development was published on 10 March 2021. This document replaces the code of best practice published by the Welsh Government in 2003. It has been produced jointly between Welsh Government, planning authorities and the mobile industry in the light of changes to the planning legislation and policy and is intended to facilitate the smooth roll-out and upgrading of mobile telecommunications apparatus in Wales.

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

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

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

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

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

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

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

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

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

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

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

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

It is noted that over 95% of households in the UK own at least one mobile phone. As such, the Code acknowledges that the ubiquity of mobile telecommunications means that it is an essential element of modern life and the Welsh Government is committed to supporting the roll out and upgrade of the mobile phone network.

The Code sets out its aims which are fourfold:

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

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

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

The Code of Best Practice acknowledges that there are large parts of Wales where there is little to no mobile connectivity. It is noted that these are often challenging areas to deploy mobile infrastructure because of topography and the economics of developing installations that might only serve small populations and low numbers of passing customers.

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

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

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

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

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The Code acknowledges the main technical and operational criteria as:

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

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

The sequential approach to new site selection is still advocated:

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

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

'In assessing proposals, planning authorities should have due regard to the special technical and operational considerations, and not seek to place or make unrealistic

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design demands. Planning authorities should give consideration to the balance between improved digital connectivity and the perceived visual impact of the development'.

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

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

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

Paragraphs 7 to 9 relate to backhaul and acknowledge that ideally backhaul is provided via fibre optic cables directly to the base station. However, where fibre backhaul is not possible, there must be the deployment of a microwave dish link transmission. A dish will be attached to the mobile base station to transmit the data to a secondary base station with a fibre connection. Para 8 explains how mobile base stations with fibre backhaul provided will also have dishes attached. This is because these dishes are needed to connect a remote site where there is no fibre backhaul into the network.

The Code of Best Practice also highlights the difficulties that topography can pose for radio propagation at para 15:

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

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

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

Para 22 notes the importance of radio base stations:

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

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

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

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

Para 28 notes that site sharing is supported in terms of minimising the number of sites required and reducing proliferation. However, sharing means the mast must be able to support all the equipment for all technologies for the operators. This is a significant amount of equipment both on the mast and at the base for the equipment housing. In order to support this equipment, the mast must be robust and will often dictate a larger installation.

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

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

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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. High priority should be given to protecting such areas and the need to safeguard areas of particular environmental importance. In National Parks and Areas of Outstanding Natural Beauty proposals should be sensitively designed and sited and the developer must demonstrate that there are no suitable alternative locations."

The proposed upgrade would result in little change to the existing installation as it stands. As such, it remains the most suitable site to serve the locality whilst respecting the existing character and appearance of the area.

The Development Plan

Caerphilly County Borough Local Development Plan (LDP) up to 2021 (adopted in November 2010). The adopted LDP is currently undergoing a review with a view to adopt a new LDP in the future, but this is still in very early stages.

The Plan sets out the vision for the area and states:

"The Development Strategy for the Local Development Plan will capitalise on the strategic location of Caerphilly County Borough at the centre of the Capital Network Region. It will ensure that the needs of all the County Borough's residents and visitors are met and the regeneration of our towns, villages and employment centres and the surrounding countryside is delivered in a well-balanced and sustainable manner that reflects the specific role and function of the individual settlements."

The LDP lists a number of aims, including:

"To protect the environment as a whole whilst balancing the need for development with the need to conserve valuable resources.

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To underpin all development with the principle of good design, that meets a diversity of needs; which uses resources efficiently; and which makes adequate provision for recycling and waste management.

To ensure equal opportunities for all to proposed and existing facilities and services within and outside the County Borough. To increase the economic prosperity of the people and communities of the County Borough through the provision of land for employment opportunities, supported by appropriate housing and ancillary facilities and services...”

Until the Revised LDP is adopted, the existing LDP will remain in place for all planning decisions, in line with advice issued by the Welsh Government.

Within Caerphilly LPD para 1.45 states:

“The sustainable provision of adequate and efficient infrastructure, including utilities such as water supply, sewers, waste management, electricity, gas and telecommunications, is crucial for the sustainability of the County Borough. Enabling new development, which is appropriately serviced by such infrastructure, is essential to the economic, environmental and social well-being of the County Borough.”

Caerphilly Regeneration Strategy 2018-2023 – A Foundation for Success

The Caerphilly Regeneration Strategy 2018 – 2023 was approved in July 2018. It sets out a strategy, themes and broad principles for regeneration and explores the strategic priorities that will need to be tackled to meet the strategy vision.

A key theme of the strategy is to support businesses. The strategy identifies the following action which is relevant to the proposal:

“Ensure easy and affordable access to digital networks, including broadband, to support everyday business needs.”

The Connecting People and Places theme acknowledges the importance of digital connectivity.

It states:

“There is a real need to connect people with business and the wider community and the role of digital connectivity is central to this theme...”

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A key priority is CPP6: Promote digital connectivity. It states:

“The use of digital technology for business and recreation and leisure uses is continuing to increase and this is having significant impacts upon how the settlements of the county borough are operating. This trend towards increasing use of technology is unlikely to stop in the foreseeable future and, as a result, it is essential that the county borough maximises its ability to benefit from increasing digital services...”

Caerphilly Foundation for Success – Delivering Prosperity after Covid

The Caerphilly Foundation for Success – Delivering Prosperity after Covid report was approved on 8th December 2021. It sets out a renewed strategic approach to address the economic turbulence as a result of the Covid pandemic and Brexit.

Digital Connectivity is identified as a Priority Theme. The report states:

“Digital connectivity is critical to a well-functioning, modern economy and the pandemic has highlighted the significant role digital inclusion has played during lockdown. From the ability to engage with health services to maintaining contact with friends and families during periods of lockdown, there has never been a greater need for digital confidence.

Digital connectivity and confidence are essential in terms of the delivery and consumption of many, varied services (both public and private) for individuals and households and importantly for business. It is also essential for all sectors of the economy to help to drive growth and create jobs.”

The report acknowledges that digital connectivity is considered a priority because it increases productivity and growth, provides clear benefits to the economy if small businesses further increase their use of mobile services, allows businesses to benefit from growth by accessing increased productivity from engaging with the digital economy, business optimisation including access to cloud services, and increasing digital skills across the County Borough.

The reports notes that this presents an opportunity, to:

“Enable the County Borough to benefit from new forms of artificial intelligence (driverless cars, wearable devices), many of which will rely on 5G networks.”

Policy SP7 Planning Obligations

“SP7 The Council will seek to secure Planning Obligations (S106 Agreements) where they are necessary to remove obstacles to planned development, meet local

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needs and make development more sustainable. Such obligations will include:

- A. Infrastructure for walking, cycling, public transport, parking
- B. Schools and ancillary facilities
- C. Community Facilities
- D. Strategic highway improvements in the Northern and Southern Connections Corridors
- E. Flood defence measures required to mitigate the risk of flooding
- F. Formal and informal open and leisure space
- G. Affordable housing and
- H. Other facilities and services considered necessary.”

Planning Assessment

Principle of development

The principle of development has been established by Welsh Government when the new permitted development rights came into force in April 2019, which enabled sites such as this one to be built under the operators permitted development rights, with prior approval for siting and appearance being the only matters that the local planning authority can take into consideration.

Notwithstanding this, the proposed development fully accords with the policies and aims set out within Planning Policy Wales, Future Wales - The National Plan 2040, TAN19- Telecommunications, the Caerphilly Local Plan and the Code of Best Practice – all of which acknowledge a requirement for telecommunications development and highlight the role it plays in modern society and achieving sustainable development.

Siting and Appearance

The site is an established telecommunications site which is suitable for upgrade and which with the amendments proposed is still considered to be suitable with regard to siting and appearance.

The upgraded site is proposed in the same location as the existing where the principle, siting and appearance of telecommunications development has been established.

The Code of Best Practice states at Para 25:

‘When selecting sites for mobile infrastructure, operators should examine local plans and designations for the area, as well as carrying out an in-person site search to identify potential options which meet their requirements. Operators should follow these general siting and site selection principles:

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- *Installation on existing buildings and structures;*
- *Erecting new ground based masts;*
- *Camouflaging or disguising equipment where appropriate;*
- *Using small scale equipment (although small cells themselves are generally used to address capacity issues as opposed to providing coverage); and*
- *Mast and/or site sharing (including redevelopment of a site to enable upgrade or sharing with another operator)'.*

As set out above, this is an established site which is already providing coverage for this area. The proposed development seeks to provide improved coverage and capacity to the locality including the provision of new technologies for Vodafone through the upgrade of the existing site.

The proposed design has been selected to balance both operational requirements with planning considerations. The site is an established telecommunications site and is proposed to be re-developed to provide upgraded coverage in accordance with the sequential approach to development set out within the Code of Practice.

The PPW (2021) and the Code of Practice is clear that the upgrading of existing masts should be encourage over the creation of new sites. There are significant benefits associated with the provision of upgraded coverage in the area. These are considered in more detail in the following sections of this assessment. It is argued that great weight should be afforded to the provision of these new and improved technologies.

The mast is similar in design to the one it replaces, being a tapered, greenfield lattice tower installation. The proposed upgrade design seeks to remove the existing 15m lattice tower supporting 4 antennas and to install a new 30m lattice mast supporting 4 antennas, relocated dish and ancillary equipment. The modern technologies do require additional equipment, close to the antennas, to operate. These RRUs are small boxes located under the antennas on the support pole. The top of the installation will appear bulkier due to the differences between the existing antennas and modern antennas.

Following technical assessment by qualified radio planners and telecommunications designers, the height of the mast has been proposed with a 15m increase. The height of the installation has been increased from 15m to 30m; the new/relocated antennas will be mounted 15m higher to be able to achieve the required levels of coverage and to over-sail the trees surrounding the site to the east and north and in the wider area.

This is the lowest possible height which can still deliver the required levels of mobile phone coverage and connectivity to the locality due to technical constraints. It is

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Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

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Classification: Unrestricted

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Theale, Berkshire, RG7 4SA

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considered that whilst perceptible, the proposed height increase would not be significantly harmful to visual amenity or character.

When weighed against the benefits of providing improved signal to the locality, the proposed design should be considered favourably in the planning balance.

With regard to appearance, the proposed design has been selected following an onsite design visit and seeks to replicate, so far as practicable, the existing design whilst taking into account modern requirements. The installation remains of a greenfield installation and accompanying cabinets. The relocated dish will be mounted under the antennas on the tower's leg. This is required for technical performance but are proportionate in size to the wider scheme and will be read in the context of the upgraded installation.

The design and type of equipment to be deployed in this case has been chosen to provide the greatest possible coverage while, so far as is practicable, minimising the impact on amenity in accordance with para 5.2.12 of the PPW (2021). It, however, must be acknowledged that technical constraints heavily influence the design and limit the scope to alter the appearance of the site to a significant degree.

The installation would not result in any significant adverse effects on the space on which it is location, when considered in the context of the existing mast and surrounding location. The site is located on at the northers corner of a grass field within Dyffryn Isaf Farm with A469 to the west and Mynydd Dimlaith to the east; however, the site is separated from the houses to the north by the mature trees and vegetation and their views are totally obscured.

The site is an established telecommunications site, and the proposed development seeks to replace the existing mast and antennas and add ancillary equipment over the creation of an entirely new site. The smallest practical components have been selected for this location and the amount of equipment kept to a technical minimum when considered in the context of the technical constraints to development associated with telecommunications apparatus. The design and colouring are proposed in accordance with the existing installation. The installation will be sited within the same location as the existing and will not result in significant adverse impact on visual amenity of neighbouring occupiers when considered in the context of the existing installation.

The proposed design has therefore sought to strike an appropriate balance between operational, environmental and planning considerations and is considered to accord with PPW (2021) and Code of Best Practice on Mobile Phone Network Development for Wales (2021).

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The proposed works would allow Vodafone to upgrade its existing site to provide high quality communications in line with customer commitments, license commitments, and to meet government targets with regard to the provision of high-quality telecommunications networks across the country. The provision of improved coverage and capacity is a significant public benefit which would outweigh any minimal harm that may occur. The upgrading of this site prevents the need for a new installation to cover this requirement and therefore keeps the number of installations to a minimum and prevents the proliferation of masts in accordance with the PPW (2021) para 5.2.12.

It is considered that the proposal utilises the most suitable design available to meet coverage demands and to provide suitable coverage. It is important to keep the impact of telecommunications development in the area to a minimum and it is considered this proposal achieves this. The benefits of the proposal also have to be considered. The provision of new superfast connectivity would be provided for Vodafone users. It is considered the significant public benefits of the proposal outweigh the minimal impact on the surrounding area.

Health Considerations:

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

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

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

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

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Economic and Social Benefits of enhanced 4G coverage

In line with PPW, there is a presumption in favour of this proposal in accordance with the well-being goals contained in the Well-being of Future Generations (Wales) Act. The Welsh Government's Mobile Action Plan advises that '*access to a useable mobile phone signal also supports all of the Well-Being of Future Generations Act Goals*'.

PPW acknowledges key issues for Productive and Enterprising Places as being increasing the use of integrated digital communications and technology to create 'smart places' and the implications of this for the way we travel, communicate, work and socialise.

National guidance set out in PPW fully supports telecommunication development. PPW10 moved the telecommunications section in to Chapter 5 which relates to Productive and Enterprising Places and the latest edition PPW11 retained it in this chapter. PPW states that these promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle climate change. It notes that a Prosperous Wales is realised through the availability of reliable communications networks and that Cohesive Communities is created by people having access to fulfilling work which is easily reached and who can communicate effectively and safely with their friends and neighbours. The key issues are ensuring that all parts of Wales have access to modern communication systems; and increasing the use of integrated digital communications and technology to create 'smart places' and the implications for this for the way we travel, communicate, work and socialise'. An upgraded installation in this location to allow the operator to provide high quality enhanced 4G coverage to the Mumbles area which will fully meet these expectations.

The social and economic benefits are a significant material consideration which should be weighed against the perceived impact associated with an installation at this location. PPW clearly acknowledges the benefits of physical, electronic and digital infrastructure citing it as playing a pivotal role in maintaining the economic well-being of Wales, as does Future Wales which sets out two policies to fully support mobile communications: policies 13 and 14. Reliable, advanced, high quality communications enables people to connect and interact with each other, either in person or electronically, to increase prosperity. It enables effective communication between people and businesses and provides a place for people to work and enjoy our natural and cultural assets. Poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity and the well-being of communities. The proposed installation will meet these criteria.

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The upgraded rooftop radio base station will provide connected digital communication infrastructure so that this urban area can be competitive, sustain existing growth and attract new high value business including the visitor economy and the agricultural economy. It will allow access to faster connection and enhanced data services, the benefits of which have been widely publicised, and which are set out in this statement. The key benefits include connecting with family, friends and colleagues at any time around the world. This benefit has never been more important, understood and relied upon than during the COVID-19 pandemic, that we all experienced, when a reliable, high quality, advanced telecommunications system was often seen as a lifeline to our loved ones, friends, family and work colleagues, helping to improve our mental health and well-being and being able to work from home where possible. The 4G network allows access to learning materials and remote learning when it is not possible to go to school, even when schools were fully reopened it enables homework to be set and carried out online and marked automatically thus freeing up teacher time. It also enables us to manage our personal information 24/7. A good quality communications system also allows us to be always entertained and informed with the latest news (which has been particularly important during the COVID-19 situation) and creating more productive and cost efficiencies for businesses. These benefits have great weight when considering any perceived harm to the character and appearance of the landscape.

Enhanced 4G provides a means to connect to superfast broadband where fibre broadband is not yet available. This allows people to connect to the internet using their mobiles and via dongles and broaden their ability to reach the global market boosting the economy and improving day to day lives. This will help promote inward investment, creating jobs to assist in retaining skilled young people in all areas.

The COVID-19 outbreak, over a very short period of time, significantly changed how we lived and worked, with far-reaching social and economic implications for every community and all parts of the economy across the UK. The pandemic has exacerbated demand and pressure on the operators networks.

Given the increasing extent of mobile only online access in households across the UK, the importance of continued mobile connectivity is highlighted to enable public participation in planning committees and other online activities, for example. It is noted that much of the proposed streamlining and modernisation will be based on greater use of digital technology. Without the relevant infrastructure in place such as the application proposal this will not be possible.

The proposed installation will help improve the area's economic prosperity, strengthen the economy's by supporting local businesses to start, grow, adapt and diversify. It will support a better environment for today and tomorrow by reducing the need to travel and in turn minimise carbon emissions.

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The radio base station will support the delivery of healthcare provision and accessibility by enabling people greater access to online services, NHS appointment reminders (every missed NHS appointment costs the NHS approximately £160 source: NHS), reminders to take medicines, make appointments etc. Medical advice can be provided remotely rather than having to travel long distances to a medical centre and medical staff can remain in the community rather than having to return to base to obtain information and they can remain in contact with colleagues.

Access to the internet in whatever medium now impacts every facet of our lives but only benefits those who can access and use it. The benefits of internet connectivity are key for both residents and businesses alike and an upgraded radio base station in this location providing the latest 4G, will support National and Regional aspirations for improved digital and mobile connectivity with full 4G coverage, with no not spots and excellent mobile phone coverage increasing digital inclusion, so all people can access services, education and training.

Digital technology has catalysed the interconnection of the global economy, with the internet enabling the free exchange of goods and services, providing consumers with greater choice and businesses with access to skills, resources and customers and opening opportunities for different ways of working and living.

The continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021². This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy.

PPW expands on the benefits of electronic communications further in paragraph 5.2.1 stating that affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensure that people are connected to important services, their communities and the wider world are essential for long term prosperity.

Paragraph 5.2.2 goes further by explaining the demands on the system. It states that modern society demands reliable fast and high capacity communication networks to ensure large amounts of data can be easily accessed or exchanged. It is the Welsh Government's objective to offer fast and reliable broadband to every property in Wales and to support the deployment of mobile infrastructure across the country. The proposed installation would fully support this Welsh Government aspiration.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/520086/2904569_nidp_deliveryplan.pdf

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Mobile connectivity is essential to the future success of the economy. The combined value of modern mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

Without upgraded services, these areas will remain with limited access to mobile. This would be contrary to the aspirations of Welsh Government which aspires to advanced broadband telecommunications throughout Wales and Future Wales which acknowledges that modern, reliable mobile telecommunications is essential to our everyday lives as highlighted during the pandemic. It notes that digital communications infrastructure is crucial to the future success and economic competitiveness of Wales's businesses and supports community and individual needs, including access to key services and facilities.

The Councillor's Guide to Digital Connectivity notes that a survey conducted by the Confederation of British Industry found that 81% of firms said that they see more reliable mobile connectivity as essential. Studies have also shown that mobile broadband is associated with positive impacts nationally, such as higher GDP and increased employment.

The Online Nation 2020 Report highlights the importance of continued access to the latest technology on mobile devices, with 35% of the internet users only accessing the internet on mobile devices (Smartphone or tablet).

The Report goes on to note that 60% of the consumer market consider smartphones are now the most important device for internet access. In September 2019, 81% of time spent online was on a mobile device (both tablet and Smartphone). Furthermore, nearly half of all adults consider that their mobile device is the device they would miss most if it were taken away.

Providing digital infrastructure to enable improvements in digital technology empowers and enables residents to have the highest quality of life, supports the creation of high quality jobs and achieves the maximum productivity levels. It will help Powys achieve its ambition of being digital first and one which its businesses, public service providers and citizens are using digital technology by default and to the fullest to grow their businesses and improve productivity to access skills, training and employment opportunities to address global challenges that have a local impact such as ill health, and social isolation; to improve living standards and well-being; and to improve the quality and value for money of public services.

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There is a demand for mobile connectivity in areas where geography, logistics or economics – or a combination of all 3, make it difficult. Mobile network capacity needs to grow to meet the demand of mobile users, who are consuming ever increasing amounts of data.

The PPW strongly supports sustainable development as does the Well-being of Future Generations (Wales) Act and the Caerphilly LDP. Mobile communication plays a significant role in sustainable development. Being able to access the internet via a mobile device allows people to access a wide range of central and local government services, buy groceries, manage finances, apply for jobs/university, and carry out school projects, send emails, download applications, send and receive instant messages, streaming and downloading data to name just a few of the benefits of being able to use an internet enabled handheld device. It also allows people to work from home or on the move without needing to return to the office. This reduces travel time, carbon emissions and increases the speed in which information is processed/shared. The proposals therefore fully comply with the PPW and the Well-being of Future Generations (Wales) Act.

The proposed scheme will fully support both the Welsh Government aspirations for a high-quality communications network across Wales, being a connected region so that it can deliver benefits by exploring new ways of working, increasing service accessibility and improving customer service. Without this new infrastructure these ambitions cannot be fully realised, and this part of Caerphilly will continue to lag behind other areas of Wales.

The proposed scheme fully complies with national guidance set out in PPW. Filling a significant coverage and capacity hole in the communications network is essential for sustainable economic growth. This is specifically in line with achieving two of the well-being goals of 'A Prosperous Wales' and 'A Wales of Cohesive Communities'. It is acknowledged in PPW particularly at paragraph 5.2.1 stating that affordable, secure electronic communications is essential to people and businesses. Furthermore, physical, electronic and digital infrastructure is pivotal in maintaining the economic well-being of Wales.

Mobile communications network development plays a vital role in enhancing the provision of local community facilities and services. Indeed, the provision of new community facilities together with the enhancement of existing community facilities, where these positively contribute to a higher quality of life, improve the social and economic well being and reduce the need to travel is fully supported by PPW, the Welsh Government Mobile Action Plan, TAN 19, and the Code of Best Practice.

Being able to use smartphones and other mobile devices such as tablets whenever and wherever you are is essential for the community as a whole. Indeed, there are

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some users who rely solely on their mobile devices as their form of communication and do not have a land line.

PPW11 strongly encourages local planning authorities to respond positively to telecommunications development. The Government recognises that widespread access to affordable, secure telecommunications infrastructure is important to citizens and businesses across Wales. It is important that the infrastructure in Wales is able to meet this challenge, helping to build a prosperous Welsh economy.

The environmental considerations of the proposed development should be considered in light of the strong economic and social benefits of providing high quality 4G service provision to residents, businesses and visitors alike.

The upgraded installation will provide high quality 4G communications in an area where it is currently identified as lacking, supporting the Government's aim of '*facilitating the development of an advanced broadband telecommunications infrastructure throughout Wales*'. This fully meets the aspirations of PPW, TAN19, the Code of Best Practice, the Welsh Government's Mobile Action Plan and Building Better places: The Planning System Delivering Resilient and Brighter Futures: - Place making and the COVID-19 Recovery. The upgraded site will ensure that the expansion of the electronic communications network is facilitated and that high quality communications infrastructure is provided to the immediate area. It will also help meet the UK Government goal of providing 95% mobile geographic coverage by 2025.

The proposed radio base station will support the Welsh Government objective to facilitate the development of an advanced broadband telecommunications infrastructure throughout Wales. The provision of adequate and efficient infrastructure including telecommunications is seen as crucial for the economic, social and environmental sustainability of all parts of Wales. High quality telecommunications underpins economic competitiveness and opportunities for households and businesses to achieve more socially and environmentally desirable ways of living and working. This is in full accordance with Future Wales, PPW and the Council's LDP, allowing the area to be more sustainable, have greater social inclusion and provide a higher quality of life than would otherwise be the case.

The Code of Best Practice acknowledges that modern society demands reliable and fast communication networks to drive economic activity, to allow people to keep in touch and to access public services. Mobile connectivity plays a central role in digitally connecting people and businesses connecting them to the internet, the cloud and to each other. An upgraded installation in this location will fully support these aspects.

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We all need high quality communications. In the modern world, a huge amount of time is spent using communications services: for work, to stay in touch with family and friends and to go about our daily lives. This is acknowledged in national planning guidance as well as the latest Ministerial Written statement from the Skills and Science Minister Julie James stated '*ensuring Wales has the mobile connectivity to allow people and 'things' to connect reliably wherever they are located will become essential*'. The Government's pledge to improve connectivity in Wales has been strengthened by its publication of the Mobile Action Plan. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we live and work, and the ability of businesses of all sizes to thrive. The importance that the Welsh Government attaches to new digital infrastructure is acknowledged in Building Better Places – The COVID-19 Recovery where it acknowledges that such development is essential to the COVID-19 Recovery and more recently Future Wales where new and improved digital communications is considered crucial to the future success and economic competitiveness of Wales's businesses and supports community and individual needs.

Being able to use e-mail, VoIP, video calls using handheld devices is becoming increasingly important for business and domestic use as the up take in smartphones increases. Without enhanced 4G provision the area would continue to lag behind other parts of Wales and the rest of the UK and would not meet the growing demand for such services by businesses or domestic users alike or the Governments aspirations that Wales is connected with the mobile service it needs. Therefore, the provision of high quality 4G coverage would take the opportunity of achieving the best for this area and the surrounding community now and in the future, supporting the economy to be both prosperous and sustainable and all communities to be successful. This is in full accordance with the aspirations of PPW and the well-being goals set out in the Well-Being of Future Generations (Wales) Act 2015 and the Council's LDP.

A National Needs Assessment – A Vision for UK Infrastructure has been published in October 2016 ([https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-\(1\).pdf.aspx](https://www.ice.org.uk/getattachment/media-and-policy/policy/national-needs-assessment-a-vision-for-uk-infrastr/National-Needs-Assessment-PDF-(1).pdf.aspx)). It sets out the infrastructure needs for the UK which includes the importance of digital technology:

'A lack of digital connectivity has a detrimental effect on business operations, productivity and output and hence competitiveness in the global market place. Securing digital connectivity is thus critical to the UK's long term prosperity. A key challenge for the digital sector is a persistent digital divide between those who have access to the latest technologies and those who do not, with resulting social and economic exclusion, particularly as dependence on e-services and digital communications increases' (page 66 A National Needs Assessment).

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The Assessment goes on to note that '*Universal digital connectivity would serve as an equaliser of economic opportunity in that it enables participation in a modern digital economy*'. Therefore, this Needs Assessment further explains the consequences of a lack of coverage and the effects this has on social and economic prosperity. This clearly highlights the importance of providing new 4G coverage to this area of Mumbles, where the economic benefits will outweigh social and environmental considerations.

It has been demonstrated that the proposed installation would enhance and provide new community facilities, positively contributing to the quality of local community life, meet the economic and social needs of the people who live and work in the area, provide balanced communities with appropriate services and facilities and conserve the character of the area. Therefore, the proposals fully accord with PPW, Future Wales, TAN 19, The Code of Best Practice, the Welsh Government Mobile Action Plan and the Welsh Government Building Better Places – The COVID-19 Recovery.

There are strong economic and social benefits attached to the service and connectivity the proposed scheme will provide and these significant benefits should be given great weight when considering the acceptability of the proposed site.

OTHER RELEVANT INFORMATION:

The following documents / publications should also be considered as part of this application.

- National Infrastructure Commission for Wales Annual Report 2020 (December 2021)
- Digital Communication in Wales Report and Recommendations of the National Infrastructure Commission for Wales (December 2020)
- Online Nation 2021 Report (June 2021)

National Infrastructure Commission for Wales Annual Report 2020 (December 2021)

The Commission's aim is to give everyone the chance to improve their well-being through new and improved infrastructure that boosts economic growth and protects the Environment. It addresses three themes: Digital; Energy and Transport.

The Report acknowledges the importance of Digital Connectivity on pages 3 and 4 stating³:

³ <https://gov.wales/sites/default/files/publications/2020-12/national-infrastructure-commission-for-wales-annual-report-2020.pdf>

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'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.

...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...

...we also think that too much attention has been paid to promoting fibre to the home and not enough to mobile broadband provision. We think Wales can and should do more with its mobile infrastructure. Only 3% of all data carried on UK networks is carried on mobile networks today, a much lower proportion than elsewhere in Europe'.

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

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

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

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

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

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

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Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

Sinclair Dalby Limited, 3 Princes Street, Bath, BA1 1HL

Registered Office, Sinclair Dalby Limited, 11 Windell Street, Bath, Somerset, BA2 5BG. Registered in England 7610197.

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

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

'...we think too much attention has been paid by policymakers to promoting fibre to the home technology in the UK and not enough on improving mobile broadband provision, including using 4G and 5G connections to provide home broadband services instead of, or ahead of, fibre connections. The UK is behind most other countries in this regard, and only 3% of the total data traffic in the UK is carried over mobile networks today, much less than in most other countries. We think Wales can and should be doing more with this mobile infrastructure'.

Page 5 goes on to note:

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

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

Online Nation 2021 Report (June 2021)

The importance of the internet and access to smartphones is acknowledged within the latest Online Nation 2021 Report (June 2021). The report notes that the pandemic has highlighted the importance of being online and driven changes in the take-up and use of internet services, as many people have had a critical reliance on the internet for communications, information, entertainment and commerce. Increases in internet use in 2020 were most pronounced in spring and November 2020 lockdowns, as people turned to the internet and were more dependent than ever on

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online services for video calling for socialising or home-based working, home schooling, keeping in touch, films and gaming, shopping and information about the pandemic.

In September 2020, UK Internet users spent nearly 4 times as much time on smartphones than they did on computers. 68% of the time spent online was via smartphones up 4% from September 2019, this was compared to 18% of time spent on line via computers and 13% via tablets.

By the end of 2020 approximately 94% of UK homes had internet access, up from 89% in 2019. Video calling became an important way for people to keep in touch during the pandemic. Zoom went from a few hundred thousand users in the first few months of 2020 to more than 13 million in April and May 2020. This has dropped to 10.4 million users in March 2021, while platforms used mainly for work and education, notably Microsoft Teams have shown a sustained increase in use (13.7 million users in March 2021m up by 5.3 million year on year).

The report found that most of the time people spend on the internet is via apps on mobile devices. Online services were a crucial way for people to find out information about the pandemic, and for governments to try and track and control the spread of the virus.

The report acknowledged that the internet helped most children continue their education throughout lockdown. Virtually all households with school-aged children had access to the internet at home. 7% did not have fixed broadband and 4% had access only to a mobile phone. 1 in 5 did not have access to an appropriate device for their schoolwork all the time. The Report found that 2020 saw the rapid adoption of digital remote education by teachers, parents and children such as video conferencing, and platforms for setting and collecting work. In the first few weeks of lockdown in spring 2020, two thirds of children in England were not receiving any live or recorded lessons. By January 2021, this was down to just one in ten. The Report suggests that the use of these platforms may continue such as for those who can't attend school due to illness, or to provide additional revision materials.

Nine in ten 8 – 15 year olds who use social-media said it helped them to feel closer to their friends in 2020. The report stated that social video services offer huge benefits for users and the economy. They provide a platform for self-expression through enabling user-generated content (31% of adults and 40% of 13-17 year olds post video content).

Lockdown influenced the types of social video that were most popular such as the first episode of Joe Wickes' PE which was the most viewed YouTube video of 2020, and videos relating to home baking such as sourdough bread increased by 458%.

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Social media serves as a means of entertainment and education for many (used by 97% of adult internet users), and as an important method of marketing for businesses (online video advertising grew by 23% in the UK in 2020).

Online retail spend in the UK increased by 48% in 2020 (compared to an average annual increase of 13% in the previous 4 years). Online's share of retail spend increased from approximately 20% in 2019 to 35% in the spring lockdown and 30% in December 2020. By December 2020 11% of the UK grocery market sales were online, up from 5% at the beginning of the year. Online food delivery services also increased in demand. Just Eat being the most popular with its UK orders up 58% higher in the last quarter of 2020 compared to the same period in 2019.

The report found that 91% of households used smartphones to access the internet in 2021, compared to 65% who used tablets and 47% who accessed the internet using computers. The report also noted that 61% of UK adults who access the internet did so using both computers and smart devices.

The Report notes that the smartphone is the most-used device for accessing the internet for all age groups apart from those aged 65 +. It found that in 2020, 85% of internet users aged 16 + used a smartphone to go online, compared to nearly 75% accessing the internet via a computer and just over 50% using a tablet to access the internet. One in ten adults also stated that they only use a smartphone to go online and three in ten used their phone to complete an online form or app on a weekly basis.

Summary

An upgraded radio base station is needed at this location as part of the ongoing project to upgrade existing facilities, broadening consumer choice for mobile services.

The proposed installation will enable Vodafone to provide high quality enhanced 4G provision to this area of Caerphilly. It has been designed so that the operator can use the same well screened location and to also provide improve coverage to this area. Currently there is inadequate mobile coverage in this area. The proposed development would bring upgraded coverage to this area of Caerphilly.

The installation has been shown to accord with the requirements of the National Plan, PPW, TAN19, the Code of Best Practice and the relevant policies and objectives of the Caerphilly Local Development Plan.

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It has been shown that the proposed enhanced coverage provision is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services, where new digital infrastructure is recognised by the Welsh Government as essential to the COVID-19 recovery and should be given priority for determination by planning authorities. Hence, the proposals are in full accordance with Caerphilly Foundation for Success: Delivering Prosperity after Covid and Caerphilly Regeneration Strategy 2018-2023 – A Foundation for Success.

The proposed radio base station will enable both operators to provide high quality, reliable, advanced communications in this part of Llanelli and the surrounding area which currently does not receive adequate levels of coverage. The site has been designed to provide enhanced coverage to the surrounding area.

As acknowledged in Future Wales, modern, reliable mobile telecommunications and fast broadband services are essential to our everyday lives, as highlighted by the number of people who worked and learnt from home during the COVID pandemic. Digital communications infrastructure is crucial to the future success and economic competitiveness of Wales's businesses and supporting community and individual needs including access to key services and facilities. The social and economic benefits are strong material considerations which outweigh any minor loss of visual amenity to the surrounding area.

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

Site Type ²	Site Name and Address	National Grid Reference	Reason for not choosing

If no alternative site options have been investigated, please explain why:

This application seeks to upgrade an existing site which has been positioned to ensure the most effective delivery of mobile phone signal to the locality and where the principle of telecommunications development has already been accepted. The proposed scheme is considered to be in keeping with the existing installation and considered suitable in siting and appearance terms. The upgrading of an existing site

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/ installation is in accordance with the sequential approach to development set out under para 5.2.11 PPW (2021). As such, no alternative site options have been investigated.

² Site Type: Mast and Site Sharing, Installation on Existing Buildings and Structures, Camouflaging and disguising equipment, using small scale equipment, and Erecting a new Ground Based Mast.

Public Access Statement

Access to the site is indicated on the location plan drawing which accompanies this application. Site is within a fenced compound therefore there will be no public access to the site.

Construction and Maintenance Access

Access to the site for construction and maintenance is indicated on the drawings. Insert any access information e.g. crane/cherry picker locations, any particular access considerations such as lay-bys, highway access points, climbing ladders, controlled/locked roof top access provisions etc.

Access to the site will be as shown on the submitted proposed plans for maintenance of the site once built.

The site is likely to be visited infrequently approximately once maybe twice a year, and generally for physical maintenance purposes only. Most optimisation work can be completed remotely. Access to the site will from Pandymawr Road.

Health and Safety – including ICNIRP compliance

International Commission on Non-Ionizing Radiation Protection Declaration attached (see below)

International Commission on Non-Ionizing Radiation Protection 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 or near to the site are taken into account.

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In order to minimise interference within its own network and with other radio networks, Vodafone operates their network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision.

All operators of radio transmitters are under a legal obligation to operate those transmitters in accordance with the conditions of their licence. Operation of the transmitter in accordance with the conditions of the licence fulfils the legal obligations in respect of interference to other radio systems, other electrical equipment, instrumentation, or air traffic systems. The conditions of the licence are mandated by Ofcom, an agency of national government, who are responsible for the regulation of the civilian radio spectrum. The remit of Ofcom also includes investigation and remedy of any reported significant interference.

The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.

A declaration of ICNIRP compliance is included with the application documents confirming that the proposed installation will be within the precautionary public exposure guidelines set out by the International Commission on Non-ionising Radiation Protection. PPW provides clear advice regarding health matters at paragraph 5.2.15 and states that:

'provided that the development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, planning authorities should not consider the health aspects of mobile telecommunications equipment'.

As a result, it is not necessary for health matters to be a consideration as part of this application.

Additional relevant information

Please see reference to 'Other relevant information' in sections above.

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Confirmation that submitted drawings have been checked for accuracy

Name:	Veronica Raescu	Telephone:	07960 673 331
(Agent)			
Company	<u>Sinclair Dalby Ltd</u>		
Company	<u>3 Princes Street,</u>	Email	<u>Veronica.raescu@sinclairdalby.co.uk</u>
Address:	<u>Bath, BA1 1HL</u>	Address:	
Signed:		Date:	<u>5th April 2024</u>
Position:	<u>Surveyor</u>	(on behalf of	
		Cornerstone)	

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