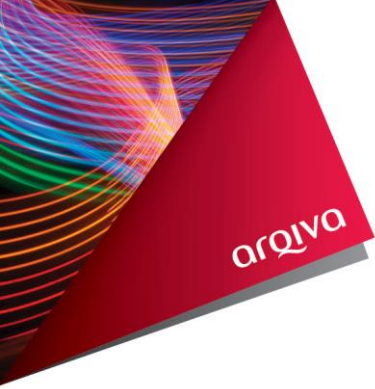




Town Planning Statement

**Proposed Upgrade of the Neath Abbey Communications
Installation, The Bank, Longford Lane, Neath Abbey SA10 7HW**

Site Reference 141249

Arqiva Limited, MBNL, EE Limited, and Hutchison 3G UK Limited

June 2020

1. INTRODUCTION

1.1 This statement is submitted in support of an application for a prior approval determination to upgrade the Neath Abbey Communications Installation. The proposed upgrade of this base station, which is managed by Arqiva, will provide fifth-generation (5G) mobile media connectivity to the local community for EE Limited and Hutchison 3G UK Limited through their network sharing joint venture called Mobile Broadband Network Limited (MBNL).

1.2 This statement includes:

- A description of the site and surrounding area
- A description of the proposed development
- An explanation of how the proposed siting and design of the development accords with National and Local Planning policies
- A summary of the considerations that have informed the proposed siting and design of the development.

1.3 Several other accompanying documents have been submitted in support of the application and these should be read in conjunction with this statement.

2. SITE AND SURROUNDING AREA

- 2.1 The Neath Abbey Communications Installation is a long-standing telecommunications site originally developed to provide TV and Radio broadcast services in Neath and Neath Abbey. It is located within a designated Green Wedge at a relatively high point in the landscape to the west of Heol Penlan and is served by a dedicated access route from Longford Lane.
- 2.2 In January 2002, planning permission was granted under case reference PA/20/0831 to extend the then 10m high broadcast mast to 20m to enable it to be shared to provide mobile phone coverage to the local area. The communications installation, which now comprises a 20m high lattice mast with attached antennas and transmission dishes, along with equipment cabins and cabinets at ground level, is set within its own fenced compound. It currently provides coverage and services for Arqiva's broadcast networks and hosts all four of the UK's Mobile Network Operators (MNOs).
- 2.3 To the east are houses at Heol Penlan and a covered reservoir, and to the south is an area of woodland, the remnants of the Dwr y Felin Lower Comprehensive School, and the Neath Abbey Infants School Early Years Unit. To the west is open land that falls towards the houses fronting The Highlands and to the north is open land extending beyond Longford Lane, Rhyd-Hir, and a public footpath that runs westwards towards The Highlands. The communications installation is located within a relatively open landscape and so the existing mast is a visible presence from several local vantage points.
- 2.4 The area to the south of the application site is likely to see significant change in the near future following the decision in February 2020 to grant planning permission for the Council to develop a replacement school on land including the site of the former Dwr y Felin Lower Comprehensive School.

3. THE PROPOSAL

The Proposed Electronic Communications Apparatus

- 3.1 The development proposed is shown in detail in the drawings submitted and involves alterations and additions to the existing communications installation to enable EE Limited and Hutchison 3G UK Limited (the brand 3) to provide 5G coverage to the local area.
- 3.2 The deployment of 5G at this site reflects the Welsh Government and the MNOs' aspiration of re-using existing communications infrastructure, such as the application site, where possible to avoid the unnecessary proliferation of new 5G specific sites and masts. This will enable existing telecommunications sites to host different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity apparatus while retaining any existing 2G, 3G, and 4G services.
- 3.3 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications for the amount, height, position and design of the apparatus required. In some cases, such as the application proposal, this requires existing masts to be extended to meet the technical, structural, and operational requirements involved. The accompanying **'5G Technical Support'** document provides further information on these details and so must be read in conjunction with this planning statement.
- 3.4 The principal elements of this beneficial proposal are as follows:
- The removal of three antennas attached to the existing 20m high lattice mast
 - A 5m extension to the mast. This required due to two factors: first, the existing mast is structurally incapable of accommodating the load bearings of the 5G apparatus required; second, there is a technical requirement to provide vertical separation between different antenna systems to prevent radio interference

- The installation of twelve antennas, twenty four Remote Radio Units, and six Breakout Boxes (BOB) that support the operation of the antennas. These will be installed on the extend part of the mast
- Two 0.6m diameter transmission dishes on the existing section of mast
- An electric supply meter cabinet at ground level with the existing compound fence line to facilitate ease of meter readings
- Removal of an existing equipment cabinet at ground level
- Additional cabinets to be installed within the existing equipment cabin at ground level. As this involves internal works, it does not constitute 'development' but has been shown on the drawings in the interests of providing a comprehensive overview of the planned upgrade of this site.

3.5 The apparatus proposed is not coloured brown (the equipment to be removed), green (antennas, dishes, and the meter supply cabinet) or blue (mast extension and support poles), as drawn on the submitted drawings, but has been shown this way for illustrative purposes only to differentiate from the existing antennas and other apparatus installed at this site.

3.6 The respective finishes for the apparatus proposed are as follows:

- Antennas: these are made of aluminium and supplied in light grey, which is the same finish as the existing antennas to be removed as part of the planned upgrade of the base station
- Transmission dishes are made of aluminium and faced in off-white/light grey

- The mast extension and support poles are made of untreated galvanised steel that will weather to a dull grey colour. This is the same finish as the existing mast
- The RRUs and BOB units are made of aluminium and plastic coloured light grey
- The electric meter supply cabinet is made of aluminium and supplied in green.

The Operators' Network Requirements

- 3.7 Section 6 of the Welsh Code of Best Practice on Mobile Network Development, published in July 2003, explains how mobile networks operate. In the annual network rollout information supplied in the past, the operators will have explained their network requirements and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Arqiva.
- 3.8 The application site has been selected by the operators and MBNL as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications masts and sites.

4. PRIOR ENGAGEMENT

- 4.1 Planning Policy Wales Edition 10, Technical Advice Note 19: Telecommunications (TAN19), and the Welsh Code of Best Practice require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an Amber score when assessed against the traffic light rating model (see Annex D of the Code of Best Practice).
- 4.2 In accordance with this rating, on 4 and 5 June 2020 we wrote to the following people and organisations to inform them of the proposed development and to provide the opportunity for them to seek further information about it:
- Councillor Martin Peters, Dyffryn Electoral Division
 - Dyffryn Clydach Community Council
 - The Headteacher, Neath Abbey Infants School Early Years Unit, 2 Heol Penlan, Neath Abbey, Neath SA10 7LB
 - The occupiers of nos. 1-39 (odds) Heol Penlan, Neath SA10 7LB
 - The occupiers of nos.112-154 (evens) The Highlands, Neath Abbey, Neath SA10 6PE.
- 4.3 At the time of the submission of this application, we had received a single representation from a local resident objecting to the installation of 5G equipment at this site. The reasons for this objection were not specified.
- 4.4 As an acceptable form of development can be brought forward involving the upgrade of an existing base station, we considered that formal pre-application engagement with the Council's Planning Department was unnecessary. If, however, you do have detailed comments to make on the proposals we should be pleased to discuss these with you at an early stage in the determination of this application.

5. PLANNING POLICY

5.1 The relevant planning policy and best practice framework is found principally within:

- National Policy, especially Planning Policy Wales (PPW)
- The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) and its accompanying Supplementary Planning Guidance
- TAN 19
- The Welsh Code of Best Practice on Mobile Phone Network Development

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

National Support for Modern Communications Infrastructure

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Similar objectives are outlined in Section 5 of PPW. Our accompanying document of national policy '**National Policy – Delivering Ultra Fast Broadband Mobile Connectivity**' sets out how 5G mobile connectivity will help underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity.

5.4 To deliver improvements to existing services and supporting future mobile technologies, it is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the UK and Welsh Governments to meet their wider sustainability and climate change

targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

- 5.5 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact. This is reflected in longstanding policy, now reflected in paragraphs 5.2.11-5.2.13 of PPW and TAN19, to minimise the potential environmental impact associated with electronic communications development by sharing masts and sites where possible.
- 5.6 This planning policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable. This is set out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. As a consequence, the starting point for planning new networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies, such as Arqiva.
- 5.7 An extended mast is required in this instance to facilitate the shared use of the site to provide 5G coverage, as the existing mast is structurally incapable of supporting the additional radio apparatus required. The impact of doing so will be mitigated by the installation of this apparatus at an electronic communications site in operational use and where the existing mast is already an established feature of the site and wider landscape in Neath Abbey.
- 5.8 Within this context, the extended mast will obviously result in some additional visual impact but we consider it should be acceptable in the planning balance having regard to guidance in paragraphs 5.2.5-5.2.13 of PPW. As part of the assessment of the planning balance, we also highlight the following:
- The 5G service is required as part of the operators' national mobile communications network, necessary to extend and improve mobile

connectivity to the local area in accordance with their Ofcom licence obligations

- All reasonable steps have been taken, through careful siting at an existing communications site, to moderate the visual impact of the development, having regard to technical and operational factors
- The proposal to share this existing communication site to provide 5G coverage looks to strike the optimum solution, particularly when compared with the only alternative option of developing a 5G-specific base station nearby. This would require the development of a new mast and compound with the associated additional impact and resources involved.

Local Planning Policy

5.9 Local Development Plan does not include a policy for electronic communications development and, therefore, the proposed changes to the base station should be considered against the relevant policies in PPW and TAN19. As explained previously, the proposal accords fully with the objectives of delivering modern communications networks and encouraging the shared use of existing telecommunication sites.

5.10 The Local Plan Policies Map designates the application site as falling within a Green Wedge under Policy EN3 of the Local Plan. The wording of this policy, which reflects similar guidance in PPW, explains that the objective of Green Wedges is to prevent the coalescence of settlements. The written justification to the policy further states that:

“5.3.18 Within the designated Green Wedges, inappropriate development will not be permitted except in very exceptional circumstances. ‘Inappropriate development’ is defined in Planning Policy Wales and relates to all types of development other than those for certain justified or essential activities that need to be located in the area and small scale extensions or farm diversification.”

5.11 With regard to these policy considerations we highlight the following:

- The proposal development will not undermine the objective of preventing coalescence, as it involves the installation of electronic communications apparatus at a previously developed site within the Green Wedge. The upgrade proposed does not require any expansion of the footprint of the existing compound and all the apparatus required will be contained within it
- The changes to the base station already benefit from the planning permission granted by the GPDO, albeit that matters of siting and appearance are before the Council for determination. As planning permission has already been granted for the development, the issue of inappropriate development and the relate test of very special circumstances does not apply.

5.12 We therefore consider that the proposal will accord with national and local planning policies for development with Green Wedges.

5.13 With regard to other local planning policy considerations, the Historic Wales Interactive Map shows records the site of a post-mediaeval house entitled Graig or Craig within the woodland to the south of the application site (entry reference 01774w). As this heritage asset is some distance from the application site, it follows that the proposed upgrade will not have any impact upon it either directly or in relation to its setting. For this reason, we consider that the development proposed will not conflict with the heritage protection policies in PPW, Strategic Policy SP21 of the Local Development Plan, or The Historic Environment Supplementary Planning Guidance.

5.14 In the light of the above, we consider that the careful approach taken to the siting and design of the apparatus demonstrates that all reasonable steps have been taken to minimise visual impact having regard to the technical and operational constraints that apply in this case. The proposal, therefore, accords with the various strands of

telecommunications, design, and heritage planning policy set out in PPW, TAN19, and the Local Development Plan.

6. DESIGN AND SITING CONSIDERATIONS

- 6.1 The development proposed is exempt from the requirement to provide a design and access statement under Article 7 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations.

Amount, Design, Layout and Scale of the Development

- 6.2 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above explained in detail in the **'5G Technical Support'** document. With regard to the main component elements of the development proposed:
- The proposed mast extension is led by operational and technical factors of 5G, although it is of the same design, materials, and finish as the existing mast. Whilst the lattice structure proposed will be evident from any near views, the latticework will help ameliorate presence over distance
 - The extended mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure often found in urban and rural landscapes, the mast proposed is a benign structure: it is lower and does not form a sting of structures that march across the countryside like electricity transmission pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters

- Alternative designs , such as replacing the existing mast with a monopole or a shareable tree mast have been considered, but they cannot accommodate the amount of apparatus necessary to support 5G. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

Antenna Array

- The numbers of antennas and dishes and their size has been kept to the minimum necessary to provide coverage and to link this site back into the operators' 5G networks. The design of these features is very much driven by operational and technical factors.

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operators' current and foreseeable network requirements. With exception of the electric meter supply cabinet, these equipment cabinets will be installed within an equipment cabin and thereby will be unseen from public vantage points. The electric meter cabinet, which is the same size and design as other cabinets found in urban and rural areas, will be positioned at the fence line for ease of meter readings

Access Considerations

- 6.3 Construction and future maintenance access to the site will be provided from the existing access route from Longford Lane. This does not require any alteration as part of the development proposed.
- 6.4 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing. This

is the same level of visits that presently take place to service the existing equipment at the site.

- 6.5 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff. Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.6 The proposed siting of the development has been very carefully chosen to minimise environmental impact in so far as the technical and operational constraints allow. Any impact of the development is principally associated with the extended mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.

Appearance

- 6.7 The approach to siting and design should minimise the appearance of the development proposed in so far as the technical and operational constraints allow. Insofar as the extended mast and attached apparatus may be visible they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with the existing communications installation in its current form.

7. HEALTH AND SAFETY

- 7.1 In support of the application, we include a separate document called ***‘5G Health and Safety’*** which sets out in more detail the associated health and safety considerations that apply to the development proposed. Every installation on a site owned or managed by Arqiva is designed to be compliant with international standards adopted by the Welsh and UK Governments.
- 7.2 To provide further reassurance, a certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 7.3 National planning policy set out in PPW and TAN19 remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines, e.g. through the refusal of planning permission.

8. SUMMARY AND CONCLUSIONS

8.1 In summary, the application is in respect of an upgrade to an existing electronic communications installation necessary to improve vital networks that provide public services. The public interest of the development is clear from the considerable benefits that will flow and it makes a significant and major contribution towards sustainable objectives.

8.2 The services provided by EE and Hutchison 3G are in the public interest and are in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more almost 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.

8.3 The operators' requirements are in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operators' networks.

8.4 The operators have followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:

- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Arqiva
- Siting at an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.
- Engagement with the local community and other stakeholders in accordance with the Code of Best Practice procedures and guidance in PPW 10 and TAN19
- An examination of design options to try and minimise potential visual impact.

- 8.5 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.
- 8.6 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy, particularly PPW. In particular it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.
- 8.8 In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which prior approval should be granted.