

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

Site Name:	Ffordd Baglan Streetworks	Site Address:	Ffordd Baglan, Baglan Moor, Port Talbot, Glamorgan, SA12 6UX
NGR:	E:275310 N:190644		
Site Ref Number:	NPT17938	Site Type:	Proposed 5G telecoms installation: 20m high 'slim line' Phase 8 H3G street pole c/w wrap around cabinet and 3no. cabinets with ancillary works.

2. Check List

Site Selection

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

Pre-application consultation with the local planning authority Council

Written offer of pre-application consultation:	N/A	
Was there pre-application contact:		Yes
Date of pre-application contact:	11.07.2021	
Name of contact:	Email Issued to the Planning Department	

Summary of outcome/Main issues raised:

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

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

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

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

AMBER

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

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

Summary of outcome/Main issues raised:

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

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

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

School/College

Location of site in relation to school/college:

A review of available mapping shows that there is one education establishment within proximity of the proposed site.

St Joseph's Junior School- 356m from proposed site

Outline of consultation carried out with school/college:

Email sent to school on 11.07.21 notifying them of planning application.

Summary of outcome/Main issues raised:

N/A

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

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

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	22.07. 2021	

3. Proposed Development

The proposed site:

The proposed solution for improving 5G coverage here involves erecting a H3G 'slim line' Phase 8 street pole c/w a wraparound cabinet and 3 additional equipment cabinets installation as per the supplied location plan.

The technical details of this proposal are illustrated within the enclosed application design drawings. It is recognised that the very nature of installing new 5G communications infrastructure within an urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion.

CK Hutchison Networks (UK) Ltd are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, CK Hutchisons Networks (UK) Ltd will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

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

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

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

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

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

Figure 1 - Site Photographs.



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

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

Enclosed map showing the cell centre and adjoining cells:

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

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



Type of Structure

Description:

Proposed 'Slim line' Phase 8 Monopole c/w wraparound Cabinet at base and 3 no. additional equipment cabinets.

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

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

Tower/mast etc. - type of material and external colour:	See drawings
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Equipment housing - type of material and external colour:	See drawings
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Reasons for choice of design:
The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will support the UK Government Digital connectivity vision. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home – essential in these times of COVID-19 - as well as enjoying access to social, media and gaming for leisure time activities. In designing the proposed installation, the applicant has sought to achieve a balance between technical requirements and minimising environmental impact as far as was practical. It, however, must be acknowledged that technical constraints heavily influenced the design and limited the scope to alter the appearance of the site to a significant degree. In all aspects of the design now put forward the smallest practical components have been utilised to ensure that the visual impact of the development is kept to the absolute minimum. The proposed development has two main elements, the monopole which would support the antennas, and the radio equipment cabinets located at ground level adjacent to the pole. A slim and unfussy design of support structure has been chosen to minimise impact on the surrounding area. The monopole design of support structure is considered suitable. In accordance with the requirement set within National Planning Policy Framework (December 2018) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture. The structure has an important function in terms of supporting the necessary telecommunications equipment. Furthermore, the radio antennas (housed within the pole) will transmit and receive radio signals to and from mobile handsets and other wireless devices. To operate efficiently, the radio antennas must be clear of obstructions such as buildings and trees, which is why the pole stands slightly above the surrounding properties. Nevertheless, every effort has been made to keep the height of the pole to an absolute minimum. It is considered the proposed equipment is appropriately located. It has been possible to devise a scheme which has a minimal visual impact on the surrounding area. The design would result in a less intrusive facility than other designs, therefore preserving the character and appearance of the area. It is further considered the proposal strikes an appropriate balance between operational and environmental considerations, and the impact of the development would be outweighed by significant public benefit of the proposal.

4. Technical Information

International Commission on Non-Ionizing Radiation Protection Declaration (ICNIRP) attached	Yes	
ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). Public compliance is determined by mathematical calculation and implemented by careful location of		

antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		
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5. Technical Justification

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

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

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

Discounted Options:

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

Site Reference	Reason why discounted
D1 – Nobel Avenue	within 100m of the school and private
D2- Brwyna Avenue	visibility splays issues on the corner of the junction
D3 – Rhodes Avenue	Close proximity to residential property
D4 – Afan Way	Private land belonging to the Hospital

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



7. Additional Relevant Information

Background to the Proposal

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

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

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

Planning Policy Relevant to the Development Site:

Local Planning Authority: Neath Port Talbot County Borough Council

Local Plan: Neath Port Talbot County Borough Council Local Development Plan 2011 – 2026

The Adopted Roads Register shows that the proposed location falls within adopted highway.

We have sought to comply with this policy and feedback received at the pre-con stage for this Prior Approval submission.

To the best of our knowledge our proposed site is not situated within an area with specific designations. We are however aware of the significance of statutory designations and have carefully considered the positing and appearance of the telecommunications apparatus. We believe that we have taken the necessary care and attention to the surrounding area in the siting and appearance of this mast and believe that no adverse impacts would be felt in this area.

In this instance, a new 20-metre-high H3G 'slim line' Phase 8 street pole with associated 3no. equipment cabinets (colour grey 7035) are to be positioned upon an area of existing footpath located off Seawall Road to reduce any potential visual impact. For the reasons listed above, the proposed site and scheme is not considered to pose an undue onerous material consideration and favourable determination is invited.

Development Plan Policy

The adopted Neath Port Talbot County Borough Council Local Development Plan 2011 – 2026 (adopted January 2016) forms the Development Plan for the area. There are no specific policies relating to communications within the Plan.

Of relevance to the proposal, the below extracts can be found.

1.2.8 The key priorities for the region are:

- Improving accessibility. This includes improved telecommunication links as well as developing transport connections between the key settlements;
- Developing a cutting edge knowledge economy;
- Reducing economic inactivity and developing an integrated skills strategy;
- Implementing the Waterfront Masterplan to maximise opportunities along the stunning coastline;

5.3.92 Policy RE1 Criteria for the Assessment of Renewable and Low Carbon Energy Development

Policy RE 1

Criteria for the Assessment of Renewable and Low Carbon Energy Development

Proposals for renewable and low carbon energy development will only be permitted subject to the following criteria:

1. Large scale wind farm developments (>25MW) will be expected to be located within the boundaries of the refined Strategic Search Areas.
2. Proposals for wind farms of any size outside the SSAs will only be permitted where it is demonstrated that there will be no unacceptable impact on visual amenity or landscape character through the number, scale, size, design and siting of turbines and associated infrastructure.
3. Small scale wind farm developments (<5MW) will be required to demonstrate that impacts are confined to the local scale.
4. All renewable energy or low carbon energy development proposals will be required to demonstrate that:
 - (a) Measures have been taken to minimise impacts on visual amenity and the natural environment;
 - (b) There will be no unacceptable impacts on residential amenity;
 - (c) The development will not compromise highway safety;
 - (d) The development would not interfere with radar, air traffic control systems, telecommunications links, television reception, radio communication and emergency services communications; and
 - (e) There are satisfactory proposals in place for site restoration as appropriate.

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

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

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

NATIONAL PLANNING POLICY GUIDANCE:

Planning Policy Wales (December 2018) (PPW)

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

Paragraph 5.2.1 states “Affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by

telecommunications ensures people are connected to important services, their communities and the wider world and essential for long term prosperity. ” Paragraph 5.2.5 goes on to state “Mobile telecommunications incorporates both mobile phone and mobile broadband technology services. The planning system should help support telecommunications infrastructure where it is required, whilst taking in to account the status of protected land and buildings as well as amenity considerations to protect what is valued most in our communities and environment. ”

Paragraph 5.2.9 confirms that *“Planning authorities should not question the need for the telecommunications system or seek to prevent competition between different operators.”*

In terms of new 5G technology paragraph 5.2. 10 notes *“New technologies such as 5G will result in the densification of mobile infrastructure particularly in urban areas which could require more small cell sites in street setting. The planning system will need to respond positively to this evolution in technology whilst being mindful of the impacts on amenity and the historic environment. ”* Finally, in respect of health aspects paragraphs 5.2.15 and 5.2.16 states *“Provided that the development meets the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, planning authorities should not consider the health aspects of mobile telecommunication equipment. All new base stations are expected to meet the ICNIRP guidelines. Planning authorities should not implement their own precautionary policies, such as imposing a ban or moratorium on new telecommunications development or insisting on minimum distances between new telecommunications development and existing development.”*

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

Technical Advice Note 19: Telecommunications (2002)

This guidance is now rather dated; however, the document is still of relevance. Paragraph 46 deals with technical constraints and notes: *“Each telecommunications system has different antennas, siting needs and other characteristics. Planning authorities should have regard to any technical restraints on the location and proposed development. Each application should be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include the significance of the proposed development as part of a national network.”*

Paragraph 56, dealing with environmental considerations states: *“Mast and antennas often require a particular operating height, which allows signals to clear trees and urban clutter. Telecommunications development may therefore need particular locations in order to work effectively. But those may be exactly the prominent locations that pose challenges to policies for the protection of high-quality landscapes and quality in urban areas... and the developer must demonstrate that there are no suitable alternate locations.”* In this case, it is important for 5G coverage to clear surrounding clutter, in particular trees and buildings, hence its required height.

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

Conclusion

Government considers that high-speed mobile connectivity is the lifeblood of a Community. CK Hutchison Networks (UK) Ltd is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

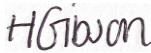
Considering the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed 20-meter-high street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community, while minimising visual impact. In this instance, following an initial desktop survey and subsequent physical search of the intended area, due to the nature of the proposed equipment, location (footpath with existing trees within the vicinity), existing street furniture (including street lighting columns), after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, while at the same time, significantly improving communications within the local vicinity.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework and along with local planning policies where applicable.

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

Contact Details

Name: (Agent)	Hannah Gibson BSc (Hons)	Telephone:	07428 015034
Operator:	CK Hutchison Networks (UK) Ltd	Fax no:	N/A
Address:	Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Email Address:	h.gibson@dotsurveying.co.uk
Signed:		Date:	23.07. 2021
Position:	Planner	Company:	Dot Surveying Ltd
		(on behalf of above operator)	