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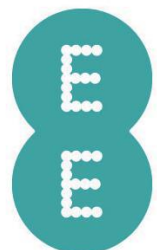


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Introduction

This Design, Access and Supporting Statement has been prepared by the Harlequin Group Limited on behalf of EE Limited. The statement has been prepared in support of the application to install a 25-metre-high telecommunications lattice tower and associated supporting equipment at Port Talbot Docks, Port Talbot, Neath, SA13 1RN.

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

In particular:

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

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

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

1.0 Proposed Development

1.1 The Site

The proposed site is located to the southeast of the River Afan and northwest of the Tata steelworks. The site is currently a large section of scrubland on the same land as the existing ex-navigation tower for the port. There is a sand embankment located at the proposed site location as can be seen from the photo above.

Due to the presence of the existing ex-navigation tower to the north of the proposed site, and other tall vertical structures/machinery located in the Port, this will provide a vertical and visual context for the proposed lattice style structure in the industrial setting. Given the height of the nearby ex-navigation tower and string of vertical/tall structures located in the distance, a lattice mast appeared to be the most obvious choice for design to mitigate the visual impact.

The proposal seeks to remove the existing EE apparatus from the tower and erect the proposed replacement site on the land adjacent to the existing. A photo of the existing site is provided below:



The application site has been specifically selected to assimilate into the existing character of the area and utilise the industrial setting. The replacement site must be in the same geographical area to ensure that the network coverage is improved effectively. Additionally, the application site lies out with any sensitive planning designations or Conservation Areas.

The installation proposed is that of a standard telecommunications lattice tower. This specific design is often utilised in industrial areas to meet the visual requirements of the local area. The height of the proposed structure, and the overall design of the tower, has been kept to a minimum to ensure that any visual impact is reduced where practicable, whilst ensuring improved network coverage is provided to the local area.

Aerial photograph of existing site location and the proposed replacement site location



1.2 Application History

The requirement for a new mobile phone base station at the selected location is to replace the existing network cell (WGL0057) for this area at Port Talbot Docks, Port Talbot, Neath, SA13 1RN.

The proposed decommissioning of the former existing installation is further to an upgrade to the site which was proposed to add additional antennas and ancillary equipment to the tower. However, the advice from the structural condition report concluded that the tower be classed as Out of Bounds and the structure should be replaced as it is beyond repair. Consequently, the requirement for a new mobile phone base station is required to provide this improved coverage.

An application for Prior Approval was submitted and thereafter approved on 17th December 2020 (Application Reference: P2020/1070) for a 25m lattice tower and associated supporting apparatus. However, following this approval, the Landowner has made EE aware that they

have redevelopment plans for the land in question and have asked that EE relocate the position and move it to the south of the approved application site.

An application for Prior Approval was submitted and thereafter approved on (Application Reference: P2021/0873) for a 25m lattice tower and associated supporting apparatus. However, following this approval, the Landowner has made EE aware that they have redevelopment plans for the land in question and have asked that EE relocate the position to the north west of the approved application site. Consequently, this application has been submitted.

The proposed replacement mast will not only service voice calls but will include provision for 3G, 4G and 5G data use which will be of great benefit to all users of the network. As you may be aware, EE have been awarded the contract to provide network services to the Emergency Services, which will operate over EE's 5G network and as such, this site will also provide coverage for all the blue light services in this area.

1.3 The Proposal

The proposed development consists of the installation of:

- 1 x 25-metre-high ground based Swann Engineering 1S lattice tower
- 6 x multi-band sector antenna fixed to tower headframe
- 2 x 0.6m DIA transmission dishes fixed below tower headframe
- 1x GPS Node fixed to tower headframe
- 1x RBS6130 Cabinet (650x700x1100)
- 1 x MK5B Link AC cabinet (1200x600x1600)
- 1.8m high palisade fence around with 1m wide gate 8m x 8m compound
- Other ancillary equipment and cabling

The proposed structure would galvanised and the ground-based equipment cabinets are to be light grey (RAL 7035).

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

1.4 Alternative Site Assessment

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

1. Aberavon Green Stars RFC - Approx. NGR: 275343, 188923
The Network Planner confirmed this site would not provide the required coverage to the target area.
2. O2 33393 - Approx. NGR: 276690, 188978
This site is too far east of the search area to provide the required coverage.

3. Tata Steel - Approx. NGR: 275848, 188273

The Landowner confirmed they would not allow a site to be installed near the steelworks.

4. Harbour Offices - Approx. NGR: 275835, 187782

This site is too far south of the search area to provide the required coverage.

5. Land adj to Port Talbot Mast - Approx. NGR: 275580, 188731

This is likely to cause ICNIRP issues with the existing navigation tower which is to remain after EE removes their equipment from the tower.

6. Dyfed Steels Ltd (Reinforcements) - Approx. NGR: 276002, 189117

This site would have more of a visual impact on the area due to not benefiting from the views of the existing site in situ.

7. Land west of North Bank Road - Approx. NGR: 275880, 189485

This site would have more of a visual impact on the area due to not benefiting from the views of the existing site in situ.

8. Aberafon Beach - Approx. NGR: 275023, 188893

This site would have too great an impact on the sea views.

9. Land at Port Talbot – Approx. NGR: 275609, 188754

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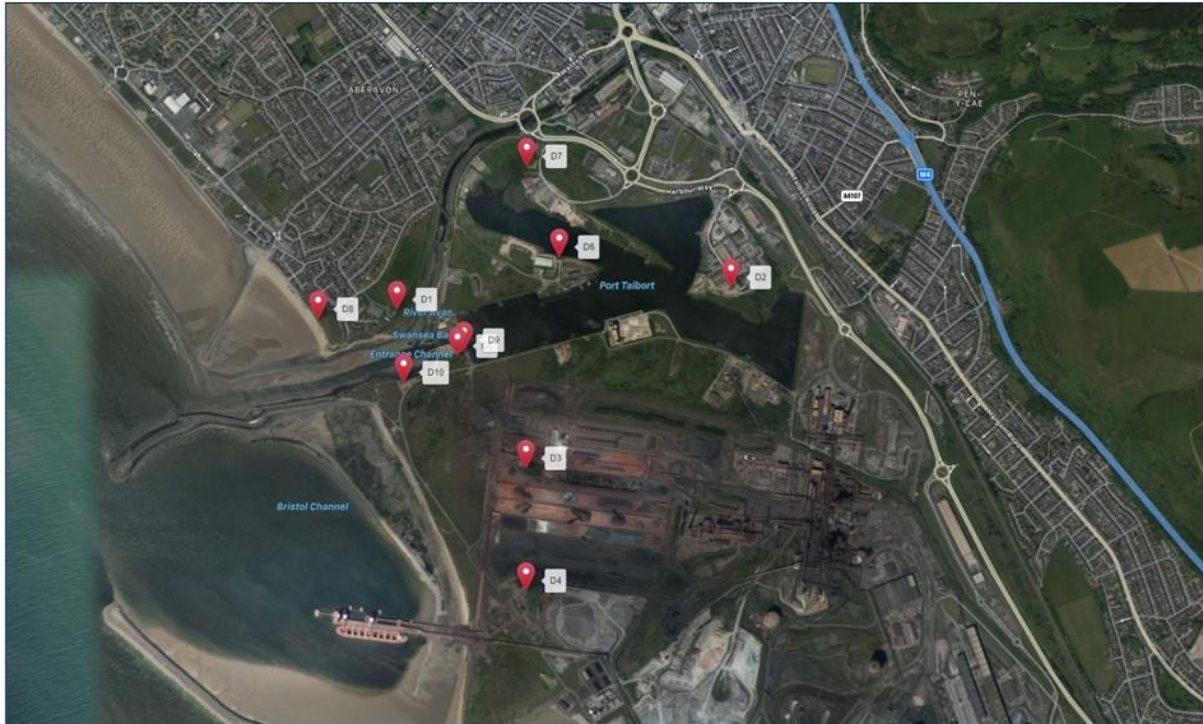
10. Land at Port Talbot 2 – Approx. NGR: 275360, 188628

This was one of the Landlord's suggested locations for relocating the site. However, given the proximity to the cost/River Afan, it was considered that the proposed site will have less of a visual impact on the area.

11. Port Talbot Dock GF - Approx. NGR: 275624, 188672

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The discounted sites that were identified as potential sites are shown on the map below:



1.5 Local Engagement

Please refer to Site Specific Supplementary Information.

1.6 Additional Justification

Emergency Services Network Requirement (ESN):

In 2015, EE won the contract from UK Government to deliver a mobile network specifically for all blue-light emergency services across the country to provide a seamless 4G mobile service. The communications system will be critical in improving response times and improving communications between all of the blue-light services and providing critical infrastructure across the length and width of the United Kingdom. EE have committed to add over 500 new 4G sites to accommodate this commitment in that will eventually replace the existing Airwave TETRA radio system. This EE proposal will form part of the new 4G emergency services network and should be considered critical infrastructure within the UK to support the local community in perpetuity.

Shared Access – The Benefits of Mobile Technology

Mobile phones and other similar communication devices are ubiquitous both for business and personal use. Mobile connectivity is now about fast, secure access to the internet anywhere. People and businesses are increasingly choosing to access the internet using a mobile device, and the numbers doing so are growing, as ownership of internet-enabled devices rises.

Smartphones are integral to people's lives as mobile devices supporting a growing range of functions from communication to navigation, to use as principle sources of news media, cameras, diaries and numerous other functions.

Overall, 94% of adults personally own/use a mobile phone with 52.4 million 4G mobile subscriptions. The proportion of adults in the UK with a smartphone has now reached 76% (as of 2017), with 18% of adults living in a mobile phone only home. Increasing coverage and take-up of higher speed 4G services is driving data use. The average volume of data consumed per subscriber per month is now 1.9GB.



Economic Benefits

Modern communications in all of their different and emerging forms, including mobile communications, help maintain and stable levels of economic growth and employment. Hence, the UK Government's continued commitment to the growth and development of modern electronic communications. These benefits include:

- Improve the ability of local businesses to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities.
- The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications that helps them maintain and attract new business and service contracts in a responsive and competitive manner.
- Improve coverage over transport and infrastructure networks which improves the ability to work on the move and improve economic efficiency



Environmental Benefits

Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development

such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.



Social Benefits

Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. These improvements manifest themselves in a number of ways as illustrated by the following examples:

- People are *now* more likely to access the internet using a mobile connection than they are to have just a landline or to access the web through a fixed connection.
- Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services; to do research for a school projects or apply to university; to manage their bank account and pay bills; to apply for a job; or to buy groceries.
- Most local authorities' services are *now* available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour.
- Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

2.0 Planning Policy

2.1 National Planning Guidance

National Planning Policy Framework (NPPF 2021)

Planning policy is provided at the national level by the Planning Policy Wales (PPW) document. It is a material consideration in planning decisions. The NPPF is pro telecommunications development with a '*presumption in favour of sustainable development*' seen as a golden thread, running through both plan making and decision taking. The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

In this regard the Framework can be summarised as follows:

- Government policy is to support high quality communications infrastructure and systems, as essential for sustainable economic growth;
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to the minimum;
- The key way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites;
- Great weight should be given to conserving landscape and scenic beauty in certain specified designated landscapes, e.g. National Parks, Areas of Outstanding Natural Beauty, Conservation Areas, etc.;
- The emphasis on minimising environmental impact is greater per the sensitivity of the site. The emphasis on exploring and utilising site sharing opportunities is consequently higher in these circumstances;
- Best practice encourages a consultative approach and one that seeks to minimise potential visual impact and
- 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.

National planning guidance on telecommunications in Wales is contained in Chapter 12 of the Planning Policy Wales (PPW) (Edition; 1st April 2019), entitled 'Infrastructure and Services'. The framework states that the development of high-speed broadband technology and other communications networks is fundamental to securing both economic and social wealth. Chapter 12 also states that, when preparing local plans, authorities should support the expansion of such facilities.

PPW Chapter 12.11.1 states that, "*The Welsh Government recognises that widespread access to affordable, secure telecommunications infrastructure is important to citizens and businesses across Wales. It is important that the telecommunications infrastructure in Wales is able to meet this challenge, helping to build a thriving and prosperous Welsh economy.*"

2.13.2 Where approval of details of planning permission is required the following should, be taken into account for telecommunications related planning applications:

- the extent to which radio and telecommunications masts can be shared; and
- the need for dishes and other installations to blend with their backgrounds.

Whilst the Government accept that the communications network is essential, it also recognises that the network should be kept to the minimum number of sites required to provide the high-quality service required. Use of existing buildings and high structures should be favoured over the development of new mast sites.

Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose Article 4 Directions, or insist on a minimum distance between new electronic communications development and existing development.

Applications for new electronic communications development should be supported by information on alternative siting and design options considered, consultation undertaken, design and siting rationale and an ICNIRP declaration. In determining applications local planning authorities must base their determination on planning grounds only, and should not prevent competition between different operators, question the need for the development, nor set different health standards to the ICNIRP guidelines.

2.2 Local Planning Policies

Further to Section 70(2) of the Town and Country Planning Act 1990 (as amended), Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that in making any determination under the planning Acts, regard is to be had to the development plan, the determination is to be made in accordance with the plan unless material considerations indicate otherwise.

The development plan has primacy in the assessment of applications made under the planning acts with the PPW being a material consideration which carries considerable weight.

Neath Port Talbot County Borough Council's local planning policies are comprised of the Local Development Plan (adopted January 2016), which is the main planning document which guides development choices and decisions in Port Talbot. However, the Local Development Plan does not contain specific telecommunications policy. Consequently, the most relevant policy to therefore assess this proposed telecommunications development is the PPW.

2.3 Planning Assessment

This supporting statement has justified the need for this proposal, and the installation of a replacement mobile phone base station at Port Talbot Dock, Puckney House.

It is considered that the proposal before the Council adheres to the PPW, with no serious adverse effect on the character or appearance of the area, and no adverse effect on any special landscape designations. The government is supportive of improvements in telecommunications networks within its jurisdiction and the proposal satisfies the requirements as per the PPW. As such, a lattice tower is proposed given the industrial nature of the surrounding area.

The proposed lattice mast in terms of its siting, set back within the natural built/industrial environment, where a string of tall/vertical lattice type structures/machinery are located within, are such that its visual impact on the wider area is minimised as far as practicable given its operational requirements. The mast will allow for upgrading of the network and potential sharing by another operator and as such gains support from the policy in this respect. It is considered that the proposal is therefore compliant with the provisions of PPW and does not present any conflict with any other saved policies within the local plan. Consequently, it is considered that the development will not appear as an incongruous or over dominant structure in either shorter or longer distance views and the application site has been specifically selected to ensure that this is the case, utilising the existing industrial setting and existing tall vertical structures/machinery to the best effect to ensure visual impact is reduced to the maximum extent, where practicable.

The proposed structure will be galvanised so that the contrast between the proposed mast, existing tall vertical structures/machinery and the skyline is reduced. The ground-based equipment cabinets are to be fir green to minimise the contrast between the proposed cabinets and the existing shrubs/vegetation surrounding the site, thereby minimising the visual impact on the area.

As demonstrated through the Alternative Site Assessment contained within this Design and Access statement, there is no alternative available existing structures, existing masts or existing buildings within the immediate locale than can be utilised to house this telecommunications apparatus. Should this application not be approved the area will remain to have poor coverage and this currently has an adverse impact on those that rely on this vital service and coverage from an economic, social and environmental perspective. Not least the Emergency Services are also reliant on the coverage the proposed replacement installation will improve ion.

Ultimately, this location is considered to be the optimum location for the installation in terms of both technical and operational needs and minimising environmental impact, in particular landscape and visual impact. The design of the development proposed is the most environmentally sensitive available to meet the operational needs of the development and, as outlined above, will be in keeping with the character of the wider setting of the local area.

It has been demonstrated that the telecommunications development, having regards to the technical and operational constraints, has been designed to minimise environmental (particularly visual) impacts through careful siting and design choices. The proposal complies with national planning guidance and as such it is considered to provide the best location from both a technical and environmental perspective.

Any information required regarding location, height of antennas, frequency etc. can be found in the supporting documents, which are submitted as part of this prior approval application. As noted above and below, an ICNIRP certificate has also been enclosed. It is contended that the siting and appearance of the development is compliant with the relevant planning policy, as noted above, and could therefore be supported by your department.

3.0 Access

Under section 42 of the 2004 Act, access requirements both to and around the site should be considered. It must be considered that this site is for telecommunications purposes only. Access to the site is to be taken directly from Harbour Way via private access route. Maintenance visits are required approximately every 6 months by an operative with a light vehicle. Consequently, it is not envisaged that access to the site would cause traffic management or other issues.

3.1 Construction and Maintenance

During the construction process, all build and maintenance regulations will be complied with. Proof of compliance can be confirmed closer to the time of construction if necessary.

3.2 Public Access

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

4.0 Regulatory Statement

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

OFCOM statistics show that in 2013 mobile phones are owned / used by 92% of UK adults. This demonstrates the vital role mobile communications play in the social and economic wealth of the country. Whilst the vast majority of the UK now benefits from mobile coverage there are still spots without coverage. EE under their communications code licence to run a public communications network are duty bound to provide equal coverage to all areas of the UK. Therefore, the need for communications systems should not be tested by Local Planning Authorities, as it is for the communications code operators to determine locations where coverage is required and demonstrate in evidence.

The development proposed is to replace an existing EE installation which is to be decommissioned and removed. Should this proposal **not** proceed, this area will suffer from poor coverage or no coverage whatsoever once the existing site requires decommissioning.

5.0 Health and Safety

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

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

6.0 Conclusions

The existing telecommunications installation is 2G/3G only and therefore provides voice and text services to EE customers within the target coverage area. As part of their UK upgrading programme EE now propose to upgrade coverage in this area to include 4G and 5G services which will provide data services to customers in addition to the existing voice and text services they enjoy. In addition, EE provide the new UK wide Emergency Services Communications Network (ESN) and their 3G/4G/5G network will support this service. As such, the upgraded installation will form part of the ESN for all of the emergency services operating within this area.

The telecommunications installation proposed as set out in this application has been designed and sited having regard to technical, engineering and land use planning considerations in order to minimise its impact on the local environment. The mast height has been kept to the minimum required to ensure operational efficiency - a structure with an overall height of 25 metres is needed in this locality due to the large target area that requires improved coverage. Consideration has been given to the design of the mast and this is reflected in the standard lattice tower design, which is frequently used within industrial areas where similar style structures are located.

In relation to planning policy, in accordance with the guidance set out in the PPW, a thorough search of the area has been undertaken and revealed that there are no existing masts or other structures suitable. Therefore, the development of a new mast site is justified, and it has been demonstrated that it has been sited and designed to minimise its visual impact and all other environmental impacts as far as practicable in accordance with the development plan. The Council are therefore respectfully asked to approve its siting and appearance, in the event that they consider such prior approval is required.