

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Water Street Streetworks	Site Address:	Water Street, Margam, Neath Port Talbot, Wales, SA13 2PA
NGR:	E: 280192, N: 184736		
Site Ref Number:	NPT16183	Site Type: Macro	Street Works Monopole – Macro Proposed telecommunications installation: Proposed Phase 8 Monopole & associated ancillary works

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why: After a phone call to the LPA 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 LPA

Written offer of pre-application consultation:	Yes
Was there pre-application contact?	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning

Summary of outcome/Main issues raised:

No comments had been received in respect to the proposals.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Amber		
Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.			
Summary of outcome/Main issues raised: No responses had been received at the time of submission.			

School/College

Location of site in relation to school/college: There are no schools in close proximity to the proposed site.
Outline of consultation carried out with school/college: N/A
Summary of outcome/Main issues raised: N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response: N/A		

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	14 th June 2023	

3. Proposed Development

The proposed site:
This is a highly constrained cell search area. The proposed site is located at Water Street, Margam, Neath Port Talbot, Wales, SA13 2PA, (NGR: E: 280192, N: 184736).

There is now a requirement to upgrade the UK Cignal Infrastructure UK Limited (Three) network to provide improved coverage and capacity, most notably in relation to 5G services. This proposal is for a 15.0m SW (Street Works) monopole located on the adopted highways at Water Street. The exact details of this proposal are illustrated on the enclosed drawings (Proposed Phase 8 Monopole & associated ancillary works).

Three are in the process of building out the UK's fastest 5G network. Three has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and able to handle more data. To bring this new technology to the people Cignal Infrastructure UK Limited will need to provide a mix of upgrades to existing sites and the building of new sites. New sites will be needed for many reasons, including that the higher radio frequencies used for 5G do not travel as far as those frequencies currently in use and that sometimes not all existing sites can be upgraded. In this area there is an acute need for a new mast to deliver the above.

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

The site selection process has also been influenced by the numerous vertical elements of street furniture distributed around the vicinity of the site including street lighting columns. The height of the pole has been kept down to the absolute minimum capable of providing the required essential new 5G coverage. The site has been selected on a wide adopted area of the highway in a position that will not impede pedestrian flow or the safety of passing motorists. The cabinets are located at the base of the new pole and unless the site is located in Article 2 (3) land these are PD without Prior Approval and do not form part of the proposal from a planning consideration perspective. This is equipment is considered unlikely to have any material impact on the local area but significant connectivity improvements which is a material consideration in the judgment of the site's suitability. The cell search area was assessed at the Survey stage from a planning and residential amenity perspective. The planning constraints (where there are any) have shaped the location of the proposal. Figure 1-3 illustrates the site and the surrounding area.

PLEASE NOTE THIS APPLICATION FOLLOWS THE REFUSAL OF APPLICATION REFERENCE P2021/0635 ON 15/06/2021. APPLICATION P2021/0635 WILL NOT BE BUILT DUE TO UNFORESEEN CIRCUMSTANCES. THEREFORE, ONLY THE MAST IN THIS APPLICATION WILL BE PROPOSED.

This area of Neath Port Talbot is predominantly residential. The proposed +15.0m AGL Phase 8 mast utilizes an extremely discreet, slimline design. The proposal has been carefully situated towards an area of greenfield. The location must be close to the users to fulfil the mast operational requirements. Adjacent to the site is existing street furniture such as fencing, streetlamps, and overhead cable poles which share similar vertical columns to the mast, supporting it in visually assimilating into the setting.

Nearby to the mast are clusters of tall, mature trees which provide natural screening for the mast, seeking to minimize any impact on visual amenities in the area.

Figure 1:



Figure 2:



Figure 3:



Policy Analysis

Local Planning Authority: Neath Port Talbot Council

Development Plan: Neath Port Talbot Adopted LDP (2011-2026) (2016)

The site is designated as being within the settlement boundary, with rural uses to the north, east, south and west. The site is in the Green Wedge and the site designation is a material consideration.

Neath Port Talbot Council does not have a specific telecoms policy. Therefore Technical Advice Note (TAN) 19 (Telecommunications) is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with PAN62.

Policy Analysis:

Policy EN3 reads:

“Green Wedges

In order to prevent the coalescence of settlements and to protect the setting of urban areas, Green Wedges have been designated in the following locations:

EN3/5 Margam

Within these areas there is a presumption against inappropriate development.”

This proposed development at the site seeks to consolidate all requisite elements (for site

sharing) into one location, minimised to ensure the scale and mass of the design is sympathetic to its surrounds, thus limiting visual impact on the wider character of the area and being suitably distant from sensitive receptors (the selection and use of the site adjacent to, and seen in the context of the wider road network has been deliberate in that the provision of digital coverage as required can be provided, with the least impact on residences (with only a limited number of properties having an indirect line of sight to the site)), yet providing capacity to ensure that it would deliver the level of service needed in this location. In this regard the proposal would accord with the Development Plan.

Furthermore, and in accordance with Policy EN3, the proposed development would not result in, or contribute to the coalescence of settlements. In addition, the form of development is not an unusual type of development in open countryside and is not considered 'inappropriate'.

It is accepted the scheme would qualify as a visual change but any perceived harm (to amenity or openness) would be materially outweighed by the tangible benefits the development would bring in terms of enhanced digital services to residents, businesses and visitors alike.

It fully accords with the requirements of TAN19.

The proposed development works are required to deliver the requisite level of electronic communication service on a structure designed to accommodate multiple future users (and so enable site sharing opportunities), yet seeks to minimise its visual impact or change to the character of this location.

The positioning of the installation seeks to ensure suitable coverage of the raised highway network and users to the west as well as ensuring the scheme would not appear incongruous in this urban context. In addition, it would be sufficiently distant from residential properties.

The proposed development would not appear out of context in this location, so according with wider Development Plan policy.

It accords with the requirements of TAN 19.

The proposed works are not to the visual detriment of the surrounding area (being suitably distant from sensitive receptors). The proposal would not result in demonstrable harm to the character of the immediate or wider area; but are vitally necessary to ensure improved delivery of service. Capacity and coverage are the key drivers for this new 5G installation. The proposal would respect and continue to maintain the character of the area, would be suitably distant from potentially sensitive users, and so would accord with the principles of the Development Plan policies. It fully accords with the requirements of Welsh Government Guidance

The sharing of base stations between multiple operators is one of the key strategic policy principles contained within Planning Policy Wales Chapter 12 Infrastructure.

12.13.3 The Welsh Government attaches considerable importance to keeping the number of masts, and the number of sites for such installations, to the minimum consistent with the efficient operation of the network. The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case. Use should also be made of existing buildings and other structures to site new antennas. Siting should, so far as is practicable, minimise the impact on amenity and the external appearance of the building.

12.11.1 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. To this end, the Welsh Government is working with the telecommunications industry and the communications regulator Ofcom to share information on communications infrastructure issues, to understand regulatory, planning and economic barriers to investment and to inform future policy making in this area.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be an intensification in the amount of equipment (an additional monopole and associated cabinets in the area) it is felt that such a minor increase would not detract from the character in which the proposal sits.

Enclosed map showing the cell centre and adjoining cells:

There is an extremely small, constrained search area for this cell. See below the cell search area and the existing sites in the immediate vicinity. Often the proposal has been pulled marginally outside of the cell search area due to residential amenity, pavement width, underground services and planning issues. The mast must be in a position where it can be physically constructed. Existing underground services continue to be a significant obstacle to the deployment of this roll out. The optimum solution from a planning and radio coverage perspective has been put forward.

Figure 4 illustrates the nominal and existing 3 UK sites in the area. The nominal is captured by the white marker below. The equipment has to be located in this marker or very close to it to give coverage and not to interfere with the adjoining Signal Infrastructure UK Limited sites.

Figure 4:



Type of Structure

Description:

Proposed Phase 8 Monopole and associated ancillary works.

Overall Height: +15.0m AGL

Height of existing building

N/A

Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc – type of material and external colour:	Proposed Phase 8 Monopole base - Galvanised
Equipment housing – type of material and external colour:	Material: Steel, Colour: Grey

Reasons for choice of design:
The proposed installation is an Signal Infrastructure UK Limited (Three) Phase 8 Monopole which will house Signal Infrastructure UK Limited (Three). The proposal is required due to acute capacity issues and will facilitate significantly improved 5G in areas that have started to gain this service and newly introduce it to the areas that have not gained this level of connectivity yet. The Operators always strive for the least visually intrusive solution whilst promoting and maintaining key coverage requirements 12.13.6 Authorities should not question the need for the telecommunications system that the proposed development is to support, nor seek to prevent competition between different operators. The aim should be for the authorities and operators to work together to find optimum solutions to development requirements. Planning Policy Wales Chapter 12 Infrastructure. The 5G antennas are some 3 times as heavy as previous antennas, while the associated Remote Radio Units also now need to be placed at the top of the pole, thus many street works designs are no longer structurally capable of hosting all the equipment of 2 operators. It should be noted that the alternative option that could accommodate both operators (EE and H3G LTE who have a site sharing agreement) would be a more traditional ‘greenfield’ mast, with an open headframe and more bulky design, which would be inappropriate in a street scene location. There is no such location in this cell search area where a greenfield mast could be housed and thus site sharing is not a viable proposition.

4. Technical Information

ICNIRP Declaration attached	Yes	
ICNIRP 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.		

5. Technical Justification

Reason(s) why site required

Government Guidance clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The site is required to provide new 5G coverage for Cignal Infrastructure UK Limited in order to improve coverage in the SA13 area of Neath Port Talbot. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the column outside of this locale.

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

Discounted Options

In accordance with the sequential approach outlined in TAN 19 following search criteria have been utilised. Firstly, consideration is always given to sharing any existing telecommunication structures in the 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 TAN 19 attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

DISCOUNTED OPTIONS:

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

The cell search area is illustrated below and is extremely constrained. The only viable option has been put forward. As with all 5G cells this is an extremely constrained cell search area. Options are extremely limited and the only viable solution that minimises amenity issues has been put forward.

Figure 5:



D1: This rooftop was discounted as it would be unable to support the telecommunications apparatus due to the pitched nature of the roof. A stub tower solution would be required however this was discounted from a planning perspective as a large stub tower would be visually prominent within the area and severely harm the amenity of the area.

D2: A site in this location would not be able to be built due to the proximity of the overhead power lines. Therefore, an installation of a radio base station in this location is problematic. A site in this location has therefore been discounted for this reason.

D3: A site in this location would not be able to be built due to the proximity of the overhead power lines. Therefore, an installation of a radio base station in this location is problematic. A site in this location has therefore been discounted for this reason.

D4: A site in this location would not be able to be built due to the proximity of the overhead power lines. Therefore, an installation of a radio base station in this location is problematic. A site in this location has therefore been discounted for this reason.

D5: The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.

D6: The footway at this location is too narrow to accommodate the operator's equipment. As such, it would lead to highway safety issues. A site in this location has therefore been discounted for this reason.

D7: An installation at this location is considered exposed with limited screening/backdrop and surrounded by residential properties. Alternatives exist which are more appropriate to deliver the required coverage to the target area. This site has therefore been discounted for this reason.

D8: An installation at this location is considered exposed with limited screening/backdrop and surrounded by residential properties. Alternatives exist which are more appropriate to deliver the required coverage to the target area. This site has therefore been discounted for this reason.

7. Additional Relevant Information

Background to the Proposal

This specific proposal forms part of an integral requirement for Cignal Infrastructure UK Limited to expand its 5G telecommunications network across Neath Port Talbot specifically in this instance to enhance 5G coverage levels and network capacity within the SA13 area.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes, and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

Siting

We have considered the detailed siting and design carefully to ensure that the scheme has a limited impact on the locality and general visual amenity.

Visual appearance

We would repeat that we have carefully placed and designed the scheme to ensure the principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is limited.

NATIONAL PLANNING POLICY

National policy with regard to Telecommunications development is found within Technical Advice Note 19: Telecommunications 2002 & Planning Policy Wales Edition 9 – November 2016 – Chapter 12 Infrastructure and Services

12.13.3 The Welsh Government attaches considerable importance to keeping the number of masts, and the number of sites for such installations, to the minimum consistent with the efficient operation of the network. The sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution in a particular case. Use should also be made of existing buildings and other structures to site new antennas. Siting should, so far as is practicable, minimise the impact on amenity and the external appearance of the

building. (Telecommunications 2002 & Planning Policy Wales Edition 9 – November 2016 – Chapter 12 Infrastructure and Services)

12.11.1 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. To this end, the Welsh Government is working with the telecommunications industry and the communications regulator Ofcom to share information on communications infrastructure issues, to understand regulatory, planning and economic barriers to investment and to inform future policy making in this area. (Telecommunications 2002 & Planning Policy Wales Edition 9 – November 2016 – Chapter 12 Infrastructure and Services)

This advises in Para 3 of TAN 19 that ‘This advice takes account of the growth of the telecommunications industry and technology, of the new social and economic demands for communications, and of the Welsh Assembly Government’s (the Assembly Government’s) environmental policies.’

The aim of telecommunications policy (as detailed in Para. 1) is therefore to ensure that people have more choice as to who provides their telecommunications service, a wider range of services from which to choose and equitable access to the latest technologies as they become available.

Para. 65 of TAN 19 states that ‘Siting and design concerns may centre particularly on the type of mast and its impact, particularly if located in a designated area. Its height, ancillary development and the scope for landscaping and screening will also be important considerations. But many antennas have special siting needs because they have a limited range or require line-of-site. Authorities should take full account of these needs’.

Para. 66 states that ‘Local planning authorities should ensure that they understand the constraints the operator faces, whether due to the nature of the technology or the legal requirement to provide a service.’

Para. 67 states that ‘In seeking to arrive at the best solution of an individual site, authorities and operators should consider the use of sympathetic design and camouflage to minimise the impact of development on the environment.’ Particularly in designated areas, the aim should be for apparatus to blend into the landscape encourages authorities and operators to “work together” and use sympathetic design and camouflage to minimise the impact of development on the environment. Particularly in designated areas the aim should be for apparatus to blend into the landscape. The telecommunications industry is encouraged to continue to develop innovative design solutions the materials and colouring (Para. 68 – TAN19). The design of the DSLAM cabinet has been shaped by the need to make it as small as possible to reduce its visual appearance. The cabinet is proposed to be painted green; however, the colour can be altered to fit the requirements of the LPA.

We consider that the development is compliant with the council’s policy and that in accordance of Part 24 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995, as amended by the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2014 and in accordance with the electronic communications code under the Telecommunications Act 1984 Schedule 2 as amended by the Communications Act 2003 permission should be granted for the installation.

We consider this development is fully compliant with the above policy guidance.

Conclusion

We consider the development 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.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of Telecommunications 2002 & Planning Policy Wales Edition 9 – November 2016 – Chapter 12 Infrastructure and Services TAN19 and Local Plan Policies.

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Signed:		Date:	16 th June 2023
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	