

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	ENVICO ENGINEERING	Site Address:	UNIT 8 BAGLAN INDUSTRIAL ESTATE, PORT TALBOT, NEATH AND PORT TALBOT, SA12 7BY
National Grid Reference:	275105, 190855		
Site Ref Number:	12782304	Site Type: ¹	MACRO

2. The Proposal

Brief summary of the proposal:

As part of Vodafone's and VMO2's continued network improvement program, there is a specific requirement for a radio base station upgrade at the above location to provide enhanced connectivity to the area. An existing telecommunications site has been identified, however the current equipment cannot accommodate the operator's latest requirements. As such, the equipment needs to be replaced in order to implement this upgrade to Vodafone's and VMO2' services.

The proposed works relate to an existing telecommunications site located within Baglan Industrial Estate in a location where no adverse impact on the surrounding amenity will be created.

This application seeks consent for the following development:

The removal and replacing of the existing 21.1m mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment with a new 22.9m monopole supporting 6 no. new antennas, 1no. new 0.6m dish, 2 no. relocated 0.3m dishes and ancillary equipment. The extension of the existing concrete base to the east and works thereto.

The proposed works seek to upgrade the site to provide improved coverage and increased network capacity, required to enable Vodafone and VMO2 to meet increasing demand for services in the surrounding areas and to support the government's ambitions for high quality telecommunications networks across the UK.

¹ Macro or Micro

In the first instance, all correspondence should be directed to the agent.

Cornerstone Industry Site Specific Supplementary Information (Wales) V.4 01.08.2023

Registered Address:

Cornerstone Telecommunications, Infrastructure Limited,
Hive 2, 1530 Arlington Business Park, Theale, Berkshire, RG7 4SA.

Registered in England & Wales No. 08087551.

VAT No. GB142 8555 06

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

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

Classification: Unrestricted

3. Pre-Application Check List

Site selection:

The upgrading of an existing site / installation is in accordance with the sequential approach set out in the Code of Best Practice on Mobile Phone Network Development for Wales (2021).

This application seeks consent with regard to the siting and appearance of:

The removal and replacing of the existing 21.1m mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment with a new 22.9m monopole supporting 6 no. new antennas, 1no. new 0.6m dish, 2 no. relocated 0.3m dishes and ancillary equipment. The extension of the existing concrete base to the east and works thereto.

This site has been identified as a site which requires and would benefit from an upgrade to accommodate increased network demands, provide modern technologies and frequencies, and allow for continued consistent coverage to be provided to this area by VMO2 and Vodafone.

In this instance, the existing mast is not suitable for re-use. This is because modern equipment is heavier and therefore requires a more robust mast to support it. A slight height increases of 1.8m is required. The design is a monopole with headframe as is already in place. The installation will be wider at the top due to the requirement of a more robust structure and headframe to support the new equipment; however, the installation will not appear significantly different from the structure already in place being of a monopole design.

This is an existing telecommunications site located within Baglan Industrial Estate at the end of Envico Engineering's courtyard accessed from Aberavon Road. The area is associated with the industrial estate and is tucked within a belt of mature trees and no residential development in proximity. The nearest properties are beyond Baglan Way and A4241; however, good separation distance has been retained. The mast is located within the area it is designed to serve in a location where it is not directly adjacent any houses and benefits from the nature of the area. This location benefits from an abundance of trees and natural vegetation close to the site and in the wider area.

There are no planning constraints on the site itself.

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

Annual area wide information to planning authority

Can the annual area wide information be provided on request?		No
If no explain why: Cornerstone's commercial relationship with Vodafone and VMO2 has changed, effectively increasing their independence to work with other companies in the deployment of mobile infrastructure. It means Cornerstone no longer has visibility of VMO2's and Vodafone's full update plans. However, Cornerstone is fully committed to working closely with Local Planning Authorities and following best practice guidance. Cornerstone aims to engage and work with the planning department at the earliest opportunity from when it is instructed to deliver new infrastructure within your Local Authority area and often conduct strategic pre-rollout engagement meetings to discuss their wider rollout. If your Local Authority would like a meeting to discuss wider Cornerstone rollout plans then please advise. We recognise the importance of developing long term partnerships and will always work with you to deliver improved mobile connectivity.		

Pre-application consultation with planning authority

Was there pre-application contact:	Yes
Date of pre-application contact:	25 th January 2024
Name of contact:	Jessica King
Summary of outcome/Main issues raised: Pre-application correspondence including a covering letter and drawings was forwarded to Neath Port Talbot County Borough Council by email on 12th January 2024. A response was received from Jessica King on 25th January 2024 raising no concerns.	

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Stakeholder Consultation

Outline consultation carried out:

Pre-application correspondence including a covering letter and proposed plans were emailed to the following persons on 12th January 2024:

- Aberavon Ward – Cllr Andrew Dacey and Cllr Stephanie Grimshaw

Summary of outcome and main issues raised:

Cllr Andrew Dacey requested a site visit on 12th January 2024. We unfortunately haven't been able to facilitate a site visit, however, we are happy to answer any queries that Cllr Andre Dacey may have in relation to the proposed works.

Schools/Colleges

Location of site in relation to school/college (include name of school/college):

None in proximity.

Outline of consultation carried out with school/college (include evidence of consultation):

N/A

Summary of outcome/main issues raised (include copies of main correspondence):

N/A

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

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

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

Copy of Developer's Notice enclosed?	Yes	No
Date served:	25 th January 2024	

4. Pre-Application Check List

Type of Structure (e.g. tower, mast, etc):	
Description:	
The removal and replacing of the existing 21.1m mast supporting 6 no. antennas, 2 no. 0.3m dishes and ancillary equipment with a new 22.9m monopole supporting 6 no. new antennas, 1no. new 0.6m dish, 2 no. relocated 0.3m dishes and ancillary equipment. The extension of the existing concrete base to the east and works thereto.	
Overall Height:	22.9 Metres
Height of existing building (where applicable):	Metres
Equipment Housing: Existing equipment cabin	
Length:	Metres
Width:	Metres
Height:	Metres
Materials (as applicable):	
Tower/mast etc – type of material and external colour:	Monopole and headframe- steel - Galvanized
Equipment housing – type of material and external colour:	N/A

Application Background:
If there is any planning history to the current proposal? Have other operators gained consent (via application or appeal) for sites nearby? No relevant planning history. Background: Cornerstone is the UK's leading mobile infrastructure services company. They acquire, manage and own over 20,000 sites and are committed to enabling best in class mobile connectivity for over half of all the country's mobile customers. They oversee works on behalf of telecommunications providers and wherever possible aim to: • promote shared infrastructure

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

Cornerstone is in the process of progressing an upgrade to an existing site within the area to ensure the inclusion of modern technologies and frequencies which will significantly improve service provision for Vodafone Limited and VMO2.

There is a specific requirement for a radio base station upgrade at this location to provide improved coverage to the area including enhanced 4G provision. An existing shared base station has been identified at Baglan Industrial Estate; however it cannot accommodate both operators' latest requirements on the existing mast, due to the technical constraints which exist.

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A replacement sturdier structure is therefore required to accommodate the upgraded equipment. The design is a monopole with an open headframe as is already in place. The proposed upgrade design seeks to replicate the existing configuration – a new monopole and headframe supporting 6 no. new antennas, 3 no. dishes and ancillary equipment to be slightly relocated east from the original location within an extended compound and concrete base. The design of the headframe has been selected to broadly replicate the mast that is already in place – an open headframe supporting the replacement equipment. The additional dish will be mounted close to the existing under the antennas. This design continues to be the most appropriate for this location as it is capable of supporting the amount of equipment required. This design is preferable in this location.

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The proposed location is shown below:



Design Statement

How the proposal complies with planning policy and guidance – How the proposal meets the siting and appearance factors listed in PPW and Code of Best Practice on Mobile Phone Network Development. How the design minimises impact, subject to technical and operational constraints. Reasons for the type of design: what alternative design solutions were considered and discounted, how the design fits in to the site and surroundings and minimises visual impact. Describe any landscaping schemes or justify why it was not required.

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

An installation is generally made up of the following components:

- The mast itself – i.e. a monopole and headframe
- Antennas and dishes
- Associated ancillary equipment
- Cabinets or equipment cabin
- Site compound / enclosure – hard landscaped
- Power – mains and /or generator.

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

Mast

The design is a monopole with headframe as is already in place. A monopole with open headframe has been selected over other available designs, this is because it is able to support equipment for two operators, provide greater coverage (by allowing for better positioning/orientation of the antennas), is structurally capable of supporting the size and weight of equipment and providing the height required by all operators and is of a similar design as the existing which will help to reduce visual prominence.

It is acknowledged that the proposed mast is of a slightly larger form and scale than the existing. This is as a result of modern equipment being heavier than previous telecoms equipment and requiring a stronger, higher and wider, installation to accommodate it. In terms of the height of the proposed structure this has been increased from 21.1m to 22.9m due to the differences between old and modern antennas. The height is required to ensure that antennas and dishes are able to over-sail surrounding vegetation providing improved coverage and connectivity to the area and enabling the required coverage to reach the required extent of the target area.

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

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

Antennas, dishes and associated ancillary equipment:

The new antennas are a similar size as the existing and will be mounted on the new headframe. The relocated dishes and the additional dish will be mounted under the antennas on the monopole. Associated ancillary equipment is proposed behind the antennas on the headframe. This equipment is generally small and is designed to make the antennas more efficient, allowing the amount of ground based equipment to be reduced and ensuring that a simple design solution can be proposed. The antennas are proportionate in scale to the mast and will not be overly prominent. The

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proposed design will ensure that the upgraded site will not appear significantly different from the installation which currently exists.

The transmission dishes are an essential to link the installation back into the wider network. It is used to link individual radio base stations to each other and, through a series of links, into the wider mobile phone and fixed line networks. In order to communicate with each other, dish antennas must have a clear line of sight, sometimes known as point-to-point communications. They must be in clear view of each other without any physical obstructions such as trees or buildings which would reduce or disrupt the low-powered signal. For this reason, dish antennas are always mounted high on rooftops or tall structures. The dish antennas used by mobile phone networks are relatively small and remain proportionate in size to the overall installation.

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

Equipment Cabinets

The existing equipment cabin within the compound will be refreshed internally.

Power

Power is a permanent supply as currently existing.

Compound

The existing compound/ concrete base to be extended as per drawings 201/A to the east to make room for the upgraded equipment.

Access

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

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Summary

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

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

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

There is a specific requirement to upgrade the existing radio base station at this location to enable enhanced 2G, 3G and 4G coverage and capacity for Vodafone and VMO2 to this area of Port Talbot. This ensures customers are able to continue to use their handheld devices for the purposes in which they have become accustomed, whilst on the move, as demands on the system for greater capacity augment as more customers access the data on the operators' network.

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

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Reason site chosen:

The applicant has taken a sequential approach and is seeking to upgrade the existing established telecommunications site. Due to the size and amount of the required antennas to provide the enhanced 2G, 3G and 4G coverage to the area for Vodafone and VMO2, a replacement equipment is required. The replacement mast is more robust, in order to structurally support the upgraded replacement/new antennas on behalf of the operators, and slightly taller, to ensure full coverage to the target area is provided. The replacement antennas will also allow both operators to utilise the same equipment and share the site, ensuring high quality coverage and capacity is delivered to the area for both operators.

These amendments to the existing radio base station will ensure that enhanced 4G coverage will be able to be accessed by users in this area, in line with the operators' legal license obligations, and the Government's aspirations that everyone has access to the information super highway network and the customers' expectations that their handheld devices are able to operate wherever they are located whether that be indoors or outside.

It is considered that utilising an existing established radio base station installation is preferable to pursuing a second base station within the immediate vicinity, as it would reduce the visual impact therefore preserving the character and appearance of the surrounding area. Given the makeup of the area and the siting of existing telecoms infrastructure on the site, it was established that the upgrading of facilities through the use of existing infrastructure would be the most viable solution. Based on this sequential approach no other sites have been considered.

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Planning Policy Framework/Development Plan Policy

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

PLANNING POLICY OVERVIEW

- Town and Country Planning (General Permitted Development) Order 1995 (as amended) - Part 24, Schedule 2 – Development by Electronic Communications Code Operators (Wales)
- Planning Policy Wales (Edition 11, February 2021)
- The National Development Framework – Future Wales the National Plan 2040 (February 2021)
- Technical Advice Note 19 – Telecommunications (2002)
- Neath Port Talbot County Borough Council Local Development Plan (2011-2026) Adopted January 2016 – No specific telecoms policy; Policy BE1 - Design

Other relevant documents:

- Code of best practice on mobile network development in Wales (2021)
- Mobile Action Plan – Welsh Government (October 2017)
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures: - Place Making and The COVID Recovery (Welsh Government July 2020)

Planning Policy Wales (February 2021)

Planning policy is provided at the national level by Planning Policy Wales Edition 11. It is a material consideration in planning decisions. Planning Policy Wales 11 is very similar to Planning Policy Wales 10 in relation to telecommunications development and remains largely the same in this respect.

Planning Policy Wales Edition 11 was issued on 28 February 2021. It refreshes PPW 10 incorporating the National Development Framework (published as Future Wales – the National Plan 2040) to set out how the planning system at a national, regional and local level can assist in delivering the Government's requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh

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Government Circulars and policy clarification letters, which together with PPW provide the National Planning Policy Framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise National Planning Policy.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-Being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

PPW sets out Welsh Government Duty. The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies that they must carry out sustainable development. PPW defines sustainable development as:

'the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.'

Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.'

Paragraph 1.18 of PPW states that legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.

Paragraph 2.8 of PPW11 states *'planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven well-being goals and by using the five Ways of Working [consideration of involvement; collaboration; integration; prevention; and long term factors], as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle'.*

PPW11 at **paragraph 2.27** provides advice relating to the sustainable benefits of development. *'Planning authorities should ensure that social, economic,*

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environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle'.

The Well-being of Future Generations (Wales) Act sets out 7 well-being goals to help ensure that public bodies are all working towards the same vision of a sustainable Wales. Two of these goals are relevant to telecommunications development: A Prosperous Wales and A Wales of Cohesive Communities.

PPW sets out its goals for 'A prosperous Wales' which includes the development of modern and connected infrastructure to allow everybody to have a good quality of life by living in strong and safe communities, with access to decent jobs. It also acknowledges in Chapter 5 that 'A Prosperous Wales' can be achieved through increased economic activity across all sectors and at all scales. This is realised through the availability of inter alia reliable telecommunications networks. An upgraded installation in this location would fully meet this national policy requirement.

PPW states that to foster Cohesive Communities development will need to be well-connected. It goes on to acknowledge in Chapter 5 that Cohesive Communities are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours. Having access to a high quality, reliable and advanced telecommunications network fully complies with Chapter 5 of the PPW.

PPW notes the importance of high-quality telecommunications. **Paragraph 3.61** states that 'adequate and efficient infrastructure' including services such as *'telecommunications is crucial for economic, social and environmental sustainability. It underpins economic competitiveness and opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working'*.

The Welsh Government's continuing strong support for telecommunications is demonstrated within the revised edition 11 of PPW because the telecommunications section is still included within the 'Productive and Enterprising Places' Chapter.

Chapter 5 of PPW11 continues to include telecommunications in the Productive and Enterprising Places which includes telecommunications. It defines Productive and Enterprising Places as *'those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle the climate emergency'*.

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Places which are productive and enterprising contribute to the seven goals of the Well-being of Future Generations Act which include inter alia:

A Prosperous Wales can be achieved through increased economic activity across all sectors and at all scales. This is realised through inter alia reliable communication networks.

A Healthier Wales can be achieved through the reduction in emissions and air pollution.

A more Equal Wales can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.

Cohesive Communities are created by people who have access to fulfilling work which is easily reached locally through sustainable transportation infrastructure and who can communicate effectively and safely with their friends and neighbours.

A Globally Responsible Wales is promoted by reducing our carbon footprint.

Productive and Enterprising outcomes are acknowledged as being inter alia:

- Promoting physical and mental health and well-being;
- Convenient access to goods and services;
- Minimising the need to travel;
- Not car dependent;
- Good connections;
- Embraces smart and innovative technology; and
- Enables easy communication.

The proposed upgraded radio base station would meet all the above objectives.

PPW identifies key issues for the Productive and Enterprising Places theme as being inter alia:

- Readying Wales for further technological innovation in the mobile and broadband sector so it can adapt to future change while ensuring that all parts of Wales have access to modern communication systems;
- Increasing the use of integrated digital communications and technology to create 'smart places' and the implications of this for the way we travel, communicate, work and socialise;
- Supporting and enabling...infrastructure to support progress towards a circular economy.

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Providing the digital infrastructure to provide high quality coverage in this area is a precursor to enable all the above key issues to be addressed. Without access to mobile connectivity the above cannot come to fruition.

The revised PPW continues to acknowledge that new developments should be electronically connected to enable efficient access to the internet and communications system to drive forward economic competitiveness, increase flexible working opportunities and minimise digital exclusion.

Chapter 5 outlines the benefits of economic infrastructure. Section 5.1 sets the context and notes that infrastructure, be it physical, electronic or digital, plays a pivotal role in maintaining the economic well-being of Wales. It enables people to connect and interact with each other, either in person or electronically, to increase prosperity. It enables effective communication between people and businesses and provides a place for people to work and enjoy our natural and cultural assets. Poor infrastructure can be both a disincentive to investment and growth, and have a detrimental impact on quality of life, prosperity and the well-being of communities. An upgraded radio base station is vital for the economic well-being of this area of Port Talbot and the surrounding community.

Section 5.2 relates specifically to electronic communications and notes *'affordable, secure electronic communications infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people are connected to important services, their communities and the wider world and essential for long term prosperity. Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home whether accessing new digital services or working. Greater numbers of individuals working from home are a growing trend and planning authorities should take this into account when preparing their development plans. Providing access to 4G services fully meets the PPW in this respect.*

Paragraph 5.2.2 acknowledges the importance of high quality communications. It states that *'modern society demands reliable fast and high capacity communication networks to ensure large amounts of data can be easily accessed or exchanged. It is the Welsh Government's objective to offer fast and reliable broadband to every property in Wales and to support the deployment of mobile infrastructure across the country'*. The proposed installation fully meets this Welsh Government objective.

PPW offers guidance on telecommunications stating at paragraph 5.2.5 that *'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'*.

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Paragraph 5.2.9 makes it clear that *'planning authorities should not question the need for the telecommunications system nor seek to prevent competition between different operators'*.

PPW encourages the efficient use of telecommunications infrastructure noting that *'mobile operators should share telecommunications masts where possible to ensure the efficient use of infrastructure and to minimise environmental impact'* (paragraph 5.2.11). The proposed monopole has been specifically designed to enable it to be shared by Vodafone and VM02 and although not capable of being shared by a third party, this was considered a suitable balance given the nature of the area and its unsuitability for a monopole with an open headframe.

Paragraph 5.2.12 goes on to state that *'the sharing of masts and sites is strongly encouraged where that represents the optimum environmental solution... for example in designated or sensitive landscape areas. The design of masts will be an important consideration where sharing is likely to be the preferred approach and efforts to disguise apparatus should be pursued where necessary. Wherever possible, use should be made of existing buildings and other structures to site new equipment...Siting should allow for the greatest possible coverage while, so far as is practicable, minimising the impact on amenity and the external appearance of a building'*.

There are no existing buildings or structures within the operators search area which are suitable to provide the necessary coverage to the target coverage area. As such, a ground based installation is proposed. The height is the minimal possible to provide high quality service provision into this area of Port Talbot and the surrounding community. The design of a monopole as the existing ensures that the impact on the locality is minimised as much as possible.

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

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

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

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

The National Development Framework – Future Wales The National Plan 2040 (February 2021)

Future Wales forms part of the statutory development plan. It was published on 28 February 2021. Statutory Development Plans (SDPs) and Local Development Plans (LDPs) must be in general conformity with Future Wales. The Planning Act requires the Welsh Ministers to produce and keep up-to-date the National Development Framework (Future Wales). Future Wales must cover a 20-year period accommodating government priorities into a single document, coherent direction, indicating the land use implications for key goals and objectives.

Future Wales sets out the Welsh Government land use priorities and provides a national land use Framework for SDPs and LDPs. It concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, highlighting areas which need protecting and enhancing and helping to co-ordinate the delivery of Welsh Government policies to maximise positive outcomes.

It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Future Wales is a spatial plan, which means it sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people. Future Wales sets the challenge of delivering these improvements to the public, private and third sectors. It makes clear the importance of planning new infrastructure and development in such a way that they are complementary rather than competing priorities, ensuring opportunities are maximised and multiple benefits are achieved.

Julie James MS Minister for Housing and Local Government stated in the Foreword to Future Wales that:

‘By co-locating different land-uses we can minimise the amount of travelling we need to do to reach work, open spaces, shops and public services from our homes. Not only is this environmentally sound planning, it offers great social, economic and cultural benefits too...

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...this Government is committed to supporting and delivering more active travel and sustainable transport infrastructure, new renewable energy schemes, improved digital communications infrastructure and new public services and facilities. In all these areas our decisions can contribute towards decarbonisation, healthy and active lifestyles, a resilient and diverse environment and increased economic prosperity and fairness'.

As part of the Overview of Future Wales there is a reflection on the COVID Pandemic and what has been highlighted as important in our lives:

'There was a collective appreciation of the value of parks and green spaces, walking and cycling routes, local shops and amenities, and the cleaner air that emerged during the lockdown. The essential nature of good broadband and telecommunications connections to enable people to work from home, access services, and to stay in touch with one another has also been highlighted during this period. Good digital communications can have a positive effect on well-being. Among the many important challenges in the recovery period will be ensuring all communities enjoy access to these fundamentally important things'.

The upgrade of this radio base station will fully meet the Future Wales acknowledged importance of good digital communications to help in the recovery period of the Pandemic allowing customers access to this essential service.

As the national development framework, Future Wales is the highest tier of development plan and is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. However, such is the importance of good mobile communications for Wales that it has set out two policies to support the provision digital telecommunications service across Wales in the form of Policies 13 and 14.

Policy 13 relates to supporting digital communications. It states that:

'The Welsh Government supports the provision of digital communications infrastructure and services across Wales. Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this. New developments should include the provision of Gigabit capable broadband infrastructure from the outset'.

There is currently very limited service provision for Vodafone or VMO2, who will also utilise this same structure to provide enhanced 4G coverage to this area. Providing

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high quality coverage to enable handheld devices to function will fully meet Policy 13 of Future Wales.

Policy 14 relates to planning in Mobile Action Zones and states that the Government will identify areas where there are little to no mobile telecommunication coverage and where this coverage will need to increase:

'The Welsh Government supports increased mobile phone coverage and the associated economic and social benefits it brings. The Welsh Government will identify Mobile Action Zones, showing locations where there is little or no mobile telecommunications coverage. The Welsh Government, planning authorities and mobile telecommunications operators must work together to achieve increases in mobile coverage within Mobile Action Zones'.

The surrounding Winch Wen area has limited mobile phone coverage. Thus, whilst the Mobile Action Zones have yet to be identified, the proposed installation meets the essence of Policy 14 and its aspiration to provide good quality mobile connectivity to areas where coverage is poor.

Page 90 of Future Wales sets out its unequivocal support for telecommunications including mobile telecommunications:

'The Welsh Government supports the roll-out of digital communications infrastructure across Wales. Modern, reliable mobile telecommunications and fast broadband services are essential to our everyday lives, as highlighted by the number of people working and learning from home during the COVID-19 pandemic. Digital communications infrastructure is crucial to the future success and economic competitiveness of Wales' businesses and supports community and individual needs, including access to key services and facilities'.

Clearly, an upgraded radio base station in this location would fully meet the Welsh Governments drive to improve connectivity throughout Wales due to the well versed socio economic benefits such digital infrastructure is known to bring to an area and it would link up to the next radio base station ensuring that this area finally gets the 4G coverage that other parts of the country and the UK take for granted wherever they are located whether that be indoors or outside.

It goes on to acknowledge the Welsh Government support for telecommunications development:

'The Welsh Government supports the provision of new and improved digital communications infrastructure across Wales'...

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...The Welsh Government, planning authorities and digital communications infrastructure providers must work together to ensure both mobile telecommunications and fast broadband infrastructure and services are provided...

Mobile Action Plan – Welsh Government (October 2017)

Following on from the Welsh Ministerial Statement, the Welsh Government published its Mobile Action Plan at the beginning of October 2017. It has two main sections which are relevant to telecommunications applications Mobile Connectivity in Wales and Planning.

The Mobile Connectivity in Wales section highlights the importance of mobile connectivity and how it is growing. It notes that the expectations of the mobile signal are rising, with customers wanting mobile connectivity where they live, work and want to travel. Businesses too want to take advantage of the opportunities that connectivity affords them and do not want to endure the lost opportunities that lack of connectivity costs them.

The Welsh Government recognises the growing importance of mobile technologies and wants to create the right environment to encourage further investment in mobile infrastructure and to promote innovation in mobile technologies.

The Mobile Action Plan goes on to state that mobile connectivity not only directly supports the United and Connected theme through connecting people and communities but also supports the other 3 themes by enabling business connectivity, the delivery of public services and learning opportunities. Access to a useable mobile phone signal also **supports all of the Well-Being of Future Generations Act Goals** (emphasis added).

The challenges that Wales faces are highlighted in the Ofcom Connected Nations 2016 report which reveals that for the majority of coverage measures Wales is less well served than the other UK nations. The Ofcom Connected Nations 2019 Report which was republished in March 2020 notes that there is still a wide variation in geographic coverage of mobile operators networks which remains poor in many areas. Indeed, it states that only 58% of Wales is able to receive 4G data services from all operators compared to 81% in England.

The Action Plan section on Planning acknowledges that the planning system has a key part to play in maximising mobile phone coverage across Wales. It is important that the planning regime is fit for Wales and reflects its topography and population distribution.

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Building Better Places: The Planning System Delivering Resilient and Brighter Futures: - Place Making and The COVID Recovery (Welsh Government July 2020)

This document sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the COVID-19 pandemic crisis. The planning system should be centre stage in the consideration of built and natural environmental issues that have arisen from this situation.

It notes that the pandemic crisis has highlighted the need for good quality places for people to live, work and relax in. It has further emphasised how important the quality of our living and working environments are and how much more they matter as we require more flexibility to support new working, living and learning needs.

The Government acknowledges that the COVID-19 crisis has emphasised the importance of considering health and well-being throughout the planning system to ensure communities across Wales are healthy, vibrant and inclusive.

The document sets out a number of priorities and actions for places post COVID-19. It states that in the immediate post COVID-19 phase there will be particular areas of policy which should be the focus of consideration and action, to act as a catalyst for a recovery across the pillars of sustainable development. They fall in to 3 categories:

- *'How we experienced the direct impacts of the COVID-19 lockdown period and the permanent positive changes we need to see in places and as part of new development.*
- *The lessons we have learned over this time and how we can help to make places more resilient and adaptable to future pandemics, should they happen again.*
- *Aiding the recovery post pandemic and restrictions eased to ensure it benefits all parts of society and helps us to decarbonise, tackle climate change, reverse biodiversity decline and improve health and general well-being.'*

The document identifies key issues which bring individual policy areas together to ensure that action is the most effective, inter alia:

- *'Digital places – the lockdown lifeline'*

The report goes on to state:

'This is a once in a generation opportunity for planning to have a positive effect on the future well-being of people in Wales and these policy considerations

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should be applied immediately to ensure we affect change in the most positive way possible'.

The document expands on Digital Places and the lockdown lifeline. It acknowledges that staying connected through digital means was one of the few opportunities for social interaction with friends and family and has become mainstreamed as part of our working lives throughout the lockdown period. The quality of our mobile phone and broadband connections became linked to our emotional well-being in a way that many people had not appreciated before.

The report goes on to state that with homeworking now likely to be more prevalent across the country, having reliable and good quality communications systems in place is more important than ever before to help the economic and social recovery. The proposed radio base station will be a lifeline for those wanting to work more flexibly and just to go about a more modern way of living and keeping in touch more easily with friends, family and work colleagues.

The Government document notes that the planning system can play a vital role in the position of electronic communications systems...new developments should provide sufficient infrastructure so that our homes and businesses can benefit from high quality service provision from occupation. The planning system can be used to influence the provision of new services in areas where current provision is poor...

The document states that **planning applications for new digital infrastructure should be recognised as essential to the COVID-19 recovery period and should be given priority for determination by planning authorities** (emphasis added). The proposed upgrade will expand the electronic communications network into this industrial area and augment existing coverage to a significant extent for Vodafone and VMO2. Their customers will be able to access reliable, secure, high quality-enhanced 4G service in this area which they currently are unable to do. It will also provide enhanced 4G for the Mobile Virtual Network Operator's (MVNOs) which piggy back network space off these operators to also provide high quality services in this area. These MVNO's use the same core network infrastructure as the parent network so that means if your contract is with one of the MVNO's who use these main operators networks then you will get coverage in all the same places as you would if you were to use those main operators directly. Currently VOXI, Virgin Mobile, Asda Mobile, Lebara Mobile and Talkmobile use the Vodafone network and Giffgaff, Sky Mobile, Tesco Mobile and Lycamobile use the VMO2 network. This offers choice in the market place for those customers who consider the level of coverage in their area when selecting which operator they agree future contracts with. This is in complete accordance with this Government requirement and therefore should be given priority for determination by the Council.

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Currently Vodafone has 15% of the market share and VMO2 has 19%. The MVNOs which use the Vodafone network have a combined market share of 9%. The MVNOs which use the VMO2 network have a combined market share of 15%. Thus, this installation will provide 58% of the population who have access to a mobile device and those visiting and working in this immediate area with a high quality, reliable and advanced service provision in line with the Government aspirations that everyone has access to a good mobile service.

The publication goes on to note that the National Sustainable Place making outcomes are set out in PPW and are highly relevant at this time. This includes amongst other things: Creating and Sustaining Communities – community based facilities and services; Growing Our Economy in a Sustainable Manner – Fosters economic activity, enables easy communication and embraces smart and innovative technology and Facilitating Accessible and Healthy Environments – minimises the need to travel, provides equality of access, feels safe and inclusive, good connections, convenient access to goods and services and promotes physical and mental health and well-being.

Technical Advice Note 19 Telecommunications (August 2002)

TAN 19 is somewhat dated, published in August 2002, it makes reference to the Stewart Report which is now dated and makes no mention of the 4G network. Therefore, PPW Edition 11 has greater material weight in the determination of telecommunications applications.

Paragraph 32 of TAN 19 states that development plans should cater for telecommunication development by taking account of the strategic requirements of telecommunications networks. Development Plan policies should take account of:

- The Assembly Government's overall policy approach to planning for telecommunications development set out in Chapter 12 of Planning Policy Wales.
- The requirements of the Telecommunications Act 1984.
- The need to minimise the impact of development and in particular the need to protect the best and most sensitive environments.
- The limitations imposed by the nature of the telecommunications network and the technology.

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With regard to technical constraints, Paragraph 46 states that 'each telecommunications system has different antennas, siting needs and other characteristics. Planning authorities should have regard to any technical constraints on the location and proposed development. Each application should be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include the significance of the proposed development as part of a national network'.

In terms of environmental considerations, paragraph 56 identifies that an important consideration in determining applications will be the protection from visual intrusion and the implications for subsequent network development. It acknowledges that masts and antennas often require a particular operating height which allows signals to clear trees and urban clutter. Telecommunications development may therefore need particular locations in order to work effectively. But this may conflict with policies for the protection of high quality landscapes and quality in urban areas. High priority should be given to protecting such areas and the need to safeguard areas of particular environmental importance.

Additionally, paragraph 57 considers mast and site sharing, stating that Local Planning Authorities may expect applications to identify that the possibility of erecting antennas on an existing structure has been explored. An authority should, however, bear in mind the technical constraints upon network development in reaching any decision on an application before it (paragraph 58).

Furthermore paragraph 65 identifies the consideration of siting and design in addition to the height, ancillary development and the scope for landscaping and screening. It also states that, '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.'

Paragraph 66 goes on to state 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'.

Paragraph 67 encourages the use of sympathetic design and camouflage to minimise the impact of the development on the environment.

Paragraph 68 relates to design solutions for minimising the visual impact on the area. It states that 'the telecommunications industry is encouraged to continue to develop innovative design solutions, in terms not only of the structure of the masts and antennas but also the materials and colouring. A number of different design solutions are currently available. These include masts designed to look like street furniture'.

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

The latest version of the Code of Best Practice on mobile phone network development was published on 10 March 2021². This document replaces the code of best practice published by the Welsh Government in 2003. It has been produced jointly between Welsh Government, planning authorities and the mobile industry in the light of changes to the planning legislation and policy and is intended to facilitate the smooth roll-out and upgrading of mobile telecommunications apparatus in Wales.

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

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

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

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

'Affordable, secure digital infrastructure is essential to people and businesses. The availability and exchange of information afforded by telecommunications ensures people and businesses are connected to communities and the wider world and are essential for long term prosperity. Modern society demands

² <https://gov.wales/sites/default/files/publications/2021-03/code-of-practice-mobile-phone-network-development.pdf>

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reliable and fast communication networks to drive economic activity, to allow people to keep in touch and to access public services.

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

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

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

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

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

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

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

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

The Code sets out its aims which are fourfold:

- To support the roll out of mobile phone infrastructure and to provide guidance with regards to the complex requirements associated with network deployment;

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

The Code sets out how technology has evolved over the years from 2G (voice and text messages) to 3G (internet and other data on the move) to 4G (superfast mobile broadband at speeds roughly equivalent to those you would expect from a fixed broadband connection) to the advent of 5G networks which bring very high speed, high bandwidth and low latency connectivity not just for use with mobile handsets but also for a range of other internet of things (IoT) uses including industrial and real time monitoring.

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

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

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

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

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

The Code goes on to note that all telecoms installations are principally guided by the technical need for the site and the technical constraints placed upon broadcasting a

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signal. The siting and design of such installations must therefore be balanced between perceptions of visual impact and the proposed installations' technical needs and constraints.

The Code acknowledges the main technical and operational criteria as:

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

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

The sequential approach to new site selection is still advocated:

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

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

'In assessing proposals, planning authorities should have due regard to the special technical and operational considerations, and not seek to place or make unrealistic design demands. Planning authorities should give consideration to the balance between improved digital connectivity and the perceived visual impact of the development'.

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

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

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

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

Para 22 notes the importance of radio base stations:

'The introduction of improved connectivity will benefit the whole of the community and is a public benefit socially, economically and commercially. As such planning authorities should encourage improvements in digital connectivity

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and seek to assist MNOs in finding suitable locations for new equipment.

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

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

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

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

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

The Development Plan

Neath Port Talbot County Borough Council Local Development Plan (2011-2026)
Adopted January 2016 – No specific telecoms policy.

As per the Paragraph 1.2.8 of the LPD the Council priority "improved telecommunication links as well as developing transport connections between the key settlements".

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Smart and connected digital strategy 2018-22

The Neath Port Talbot Council has set three priorities for making our county borough smart & connected:

“Priority 1

Transforming the way we deliver our functions/services and increasing use of the Council's online functions/services by residents;

Priority 2

Contributing to the development of favourable conditions for economic growth in the county borough;

Priority 3

Embracing a "digital first" approach to the way we support our workforce.

Principles – People

- Digital thinking will be embedded across the whole Council - we will adopt an approach which is '**digital first**' significantly reducing reliance on more traditional processes and ways of working;
- Digital services will be co-designed with users - our approach will be **customer-centric**;
- We will **embrace collaboration** as a means of giving users better experiences of dealing with us - external collaboration, including cross-sectoral collaboration, will help us become more efficient and productive;
- We will work to **remove the barriers** to digital participation for those who are digitally excluded.

Principles - Place

- We will work to ensure **broadband and wifi infrastructure** is available to an acceptable standard in all parts of the county borough
- We will look to **address the barriers people and organisations face** to participate online
- We will work with our schools and our partners to ensure that **all residents of the county borough can develop the skills and confidence** they need to benefit from the digital revolution; and
- We will test our proposals for change thoroughly to ensure that the benefits we want to deliver are sustainable and directly support the Council's well-being objectives

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Principles – Data

- We will maximise the value of **data and analytics to drive service change** and innovation;
- Our approach will be **open** by default;
- We will **ensure data is secure** to gain trust and confidence in our digital programmes, with access to data controlled to ensure data is only accessed and shared appropriately;
- Data will only be held as long as is **relevant**;

Principles – Technology

- ICT will continue to be an **enabler of service change and innovation** not just a curator of the ICT infrastructure;
- **Our infrastructure will be fit for the digital age** and future ICT investment decisions will take full account of the rapid changes taking place across the ICT and digital sectors;
- Testing, learning and iterating will be the way we will approach new developments, ensuring that we can prototype and innovate as a matter of course;
- We will adopt open data and open source policies to support collaboration and to stimulate innovation. “

PLANNING ASSESSMENT

PRINCIPLE OF DEVELOPMENT

The principle of development is considered to be acceptable. The justification for this has been outlined above, referring to both national and local plan policies and relevant legislation and publications.

The principle of the proposed development fully accords with the policies and aims set out within Planning Policy Wales, Future Wales - The National Plan 2040, TAN19-Telecommunications, and Neath Port Talbot County Borough Council Local Smart and connected digital strategy, Code of Best Practice and the Joint Accord – all of which acknowledge a requirement for telecommunications development and highlight the role it plays in modern society and achieving sustainable development.

SITING, DESIGN AND APPEARANCE

The main issues arising from upgrade applications are whether the proposed replacement monopole, headframe and replacement antennas, due to their scale and siting would be a visually obtrusive feature which would be detrimental to the character and appearance of the area, and whether any perceived harm would

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outweigh the significant social and economic benefits associated with the increased service provision attributed to the proposal and other valid material considerations.

With regard to site, the Code of Practice states at Para 25:

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

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

The proposal relates to an existing ground base mast which is proposed to be re-develop and will provide mast sharing for two operators in accordance with the sequential approach to development set out within the Code of Practice.

The siting of the replacement monopole will be in broadly the same location as the existing, the replacement monopole being relocated approximately 4m to the east from the original location. Permission has previously been given for a mast in this location and as such, the principle of siting a mast in this location already accepted. The main difference between the existing and proposed scheme is that the proposed installation will be approximately 1.8m taller, slightly wider at the top and within an extended compound and concrete base.

A wider and stronger headframe is required for this upgrade. This is because modern equipment is heavier and requires a more robust support. The top of the mast will appear slightly bulkier due to the differences between the existing antennas and modern antennas. They therefore require a more robust structure to accommodate their size and weight. The existing headframe cannot be reused for these reasons and must be replaced with a new one to take account of these technical and operation requirements. A narrower headframe would not be able to support the required equipment. 2 relocated dishes and 1 additional dish are to be mounted under the antennas on the replacement monopole. The height of the mast has been slightly increased from 21.1m to 22.9m to be able to achieve the required levels of coverage. The equipment within the cabin will be upgraded internally. Notwithstanding this the amount of equipment proposed remains proportionate in scale to the existing and would not appear overly dominant or excessive.

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This is the lowest possible height which can still deliver the required levels of mobile phone coverage and connectivity to the locality due to technical constraints and therefore seeks to protect the character of the area through the selection of the least detrimental design.

As has already been set out above, the PPW (2021) and the Code of Practice is clear that the upgrading of existing masts should be encourage over the creation of new sites.

The mast is to the rear of a private courtyard within the industrial estate with a line of trees to the rear and more vegetation along the road and bordering the units, meaning it is shielded from wider views, with visibility to the south partially obscured by the abundance of vegetation.

Other views will see the mast in the context of the industrial buildings with the higher land as a backdrop ensuring the installation will not be an anomalous feature in the area and ensure limited impact on the area. There is also an OLO mast to the east of the existing.

The proposed design would result in a visual change to the installation; however it is not considered that this change would result in significant harm or be detrimental to visual amenity or character. When weighed against the benefits of providing new signal to the locality, the proposed design should be considered acceptable in planning terms.

With regard to appearance, the proposed design has been selected following an onsite design visit and seeks to replicate, so far as practicable, the existing design whilst taking into account modern requirements. The installation remains of a slimline monopole design with an open headframe and accompanying cabin. The new dish will be mounted close to the existing. These are required for technical performance but are proportionate in size to the wider scheme and will be read in the context of the upgraded monopole and equipment.

Its high quality, monopole with open headframe design making use of the minimum elements at the minimum height consistent with the service requirements will have a minimal impact on the surrounding area whilst providing much needed additional services.

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

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The proposed design has therefore sought to strike an appropriate balance between operational, environmental and planning considerations and is considered to accord with PPW (2021), Code of Best Practice on Mobile Phone Network Development for Wales (2021) and with Policy BE1 of the Neath Port Talbot County LPD.

For these reasons, it is argued that the siting and design of the installation is in accordance with the aims of the LPA and PPW (2021) in so far as it relates to the matters of siting and appearance and when taking into consideration the technical constraints to design and development that exist.

Health Considerations:

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

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

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

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

Economic and Social Benefits of enhanced 4G coverage

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

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

National guidance set out in PPW fully supports telecommunication development. PPW10 moved the telecommunications section in to Chapter 5 which relates to

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Productive and Enterprising Places and the latest edition PPW11 retained it in this chapter. PPW states that these promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle climate change. It notes that a Prosperous Wales is realised through the availability of reliable communications networks and that Cohesive Communities is created by people having access to fulfilling work which is easily reached and who can communicate effectively and safely with their friends and neighbours. The key issues are ensuring that all parts of Wales have access to modern communication systems; and increasing the use of integrated digital communications and technology to create 'smart places and the implications for this for the way we travel, communicate, work and socialise'. An upgraded installation in this location to allow a shared rural network for at least 2 of the main telecommunications operators providing high quality enhanced 4G coverage to the Winch Wen area which will fully meet these expectations.

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

The upgraded radio base station will provide connected digital communication infrastructure so that this industrial area can be competitive, sustain existing growth and attract new high value business including the visitor economy. It will allow access to faster connection and enhanced data services, the benefits of which have been widely publicised, and which are set out in this statement. The key benefits include connecting with family, friends and colleagues at any time around the world. This benefit has never been more important, understood and relied upon than during the COVID-19 pandemic, that we all experienced, when a reliable, high quality, advanced telecommunications system was often seen as a lifeline to our loved ones, friends, family and work colleagues, helping to improve our mental health and well-being and being able to work from home where possible. The 4G network allows access to learning materials and remote learning when it is not possible to go to school, even when schools were fully reopened it enables homework to be set and carried out online and marked automatically thus freeing up teacher time. It also

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enables us to manage our personal information 24/7. A good quality communications system also allows us to be always entertained and informed with the latest news (which has been particularly important during the COVID-19 situation) and creating more productive and cost efficiencies for businesses.

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

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

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

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

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

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

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

The continued expansion and development of mobile networks is a key element of the National Infrastructure Delivery Plan 2016 – 2021³. This recognises that digital communications are now a crucial component of everyday life, with improvements in connectivity being key to a vibrant economy.

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

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

Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026 (Councils and Connectivity Sept 2018). Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as artificial intelligence and connected cars will change how we work, spend our leisure time and run our public services.

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

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/520086/2904569_nidp_deliveryplan.pdf

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

An upgraded installation in this location will enhance 4G service provision for Vodafone, as well VMO2 and for those users of MVNOs who buy network space off them to have access to their handheld devices wherever they are for the purposes in which they were purchased. This is fully in line with the Welsh Government's aspirations that everyone has access to mobile infrastructure across the country, readying Wales for future technological innovation in the mobile sector so it can adapt to change while ensuring all parts of Wales have access to modern communications systems. It also supports increasing the use of integrated digital communication and technology to create 'smart places'.

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

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

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

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

The PPW strongly supports sustainable development as does the Well-being of Future Generations (Wales) Act and the Neath Port Talbot County LDP. Mobile

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

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

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

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

Being able to use smartphones and other mobile devices such as tablets whenever and wherever you are is essential for the community as a whole. Indeed, there are some users who rely solely on their mobile devices as their form of communication and do not have a land line.

PPW11 strongly encourages local planning authorities to respond positively to telecommunications development. The Government recognises that widespread access to affordable, secure telecommunications infrastructure is important to

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citizens and businesses across Wales. It is important that the infrastructure in Wales is able to meet this challenge, helping to build a prosperous Welsh economy.

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

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

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

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

We all need high quality communications. In the modern world, a huge amount of time is spent using communications services: for work, to stay in touch with family and friends and to go about our daily lives. This is acknowledged in national planning guidance as well as the latest Ministerial Written statement from the Skills and Science Minister Julie James stated '*ensuring Wales has the mobile connectivity to allow people and 'things' to connect reliably wherever they are located will become*

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essential'. The Government's pledge to improve connectivity in Wales has been strengthened by its publication of the Mobile Action Plan. Our ability to access and use reliable mobile and broadband connections has become fundamental to the way we live and work, and the ability of businesses of all sizes to thrive. The importance that the Welsh Government attaches to new digital infrastructure is acknowledged in Building Better Places – The COVID-19 Recovery where it acknowledges that such development is essential to the COVID-19 Recovery and more recently Future Wales where new and improved digital communications is considered crucial to the future success and economic competitiveness of Wales's businesses and supports community and individual needs.

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

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

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

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

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of Port Talbot, where the economic benefits will outweigh social and environmental considerations.

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

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

OTHER RELEVANT INFORMATION:

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

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

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

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

The Report acknowledges the importance of Digital Connectivity on pages 3 and 4 stating⁴:

'Digital connectivity has been vital during the pandemic, enabling many of us to work from home, access services and maintain social contact. Those without good digital connectivity have been greatly

⁴ <https://gov.wales/sites/default/files/publications/2020-12/national-infrastructure-commission-for-wales-annual-report-2020.pdf>

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disadvantaged.

...evidence shows households and businesses stand to gain substantial economic benefits from both fibre to the home and 5G. The quality of these communications is critical in determining where new, high growth businesses locate and where young people choose to live...

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

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

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

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

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

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

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

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

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

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

Page 5 goes on to note:

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

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

Online Nation 2021 Report (June 2021)

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

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

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

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

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

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

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

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

On line retail spend in the UK increased by 48% in 2020 (compared to an average annual increase of 13% in the previous 4 years). Online's share of retail spend increased from approximately 20% in 2019 to 35% in the spring lockdown and 30% in December 2020. By December 2020 11% of the UK grocery market sales were online,

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up from 5% at the beginning of the year. Online food delivery services also increased in demand. Just Eat being the most popular with its UK orders up 58% higher in the last quarter of 2020 compared to the same period in 2019.

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

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

Summary

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

The proposed installation will enable Vodafone and VMO2 to provide high quality enhanced 4G provision to this area of Port Talbot. It has been designed so that both operators can also use the same structure and radio base station to also provide 4G coverage to this area of Port Talbot. Currently there is inadequate mobile coverage in this area by either of these operators. Thus, customers are unable to utilise their handheld devices for the purposes in which they were purchased.

The installation has been shown to accord with the requirements of the National Plan, PPW, TAN19, the Code of Best Practice and the relevant policies and objectives of the Neath Port Talbot County Borough Council Local Development Plan.

It has been shown that the proposed enhanced 4G provision is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services, where new digital infrastructure is recognised by the Welsh Government as essential to the COVID-19 recovery and should be given priority for determination by planning authorities. Hence, the proposals are in full accordance with Building Better Places: The Planning System Delivering Resilient and Brighter Futures: Place Making and the COVID-19 Recovery.

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

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

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

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

This application seeks to upgrade an existing site which has been positioned to ensure the most effective delivery of mobile phone signal to the locality and where the principle of telecommunications development has already been accepted. The proposed scheme is considered to be in keeping with the existing installation and considered suitable in siting and appearance terms. The upgrading of an existing site / installation is in accordance with the sequential approach to development set out under para 5.2.11 PPW (2021). As such, no alternative site options have been investigated.

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

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Public Access Statement

The site is located on private land. Thus, the site is not accessible to the general public.

Construction and Maintenance Access

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

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

The site is likely to be visited infrequently approximately once maybe twice a year, and generally for physical maintenance purposes only. Most optimisation work can be completed remotely. Access to the site will be on foot walking to the site to gain access to the equipment housed within the cabinets. In the event of the antennas within the mast needing to be maintained this will be achieved by appropriately qualified engineers climbing the tower.

Health and Safety – including ICNIRP compliance

Radio base stations and handsets use electromagnetic fields (EMFs) to transfer information and make communication possible with mobile phones and devices. EMFs are used for television and radio transmissions, by the police, fire and ambulance services, by taxi firms and public utilities. EMFs are also used for a wide range of personal and commercial equipment from electronic car keys, Wi-Fi equipment and baby monitoring devices to shop security tag systems. They are also produced by household electrical appliances like the fridges, vacuum cleaners or electric shavers.

Radio base stations are designed to comply with the stringent, precautionary public exposure guidelines set out by ICNIRP (International Commission on Non-Ionizing Radiation Protection). These guidelines have been developed following a thorough review of the science including both thermal and non-thermal effects. UK radio base station installations have been surveyed by independent bodies and found to be hundreds and sometimes thousands of times below these guidelines.

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

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

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

Additional relevant information

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

Confirmation that submitted drawings have been checked for accuracy

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Address:	Bath, BA1 1HL	Address:	
Signed:		Date:	30 th January 2024
Position:	Surveyor	(on behalf of	
		Cornerstone)	

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