

Town Planning Statement

5G Electronic Communications Base Station

At the BT Telephone Exchange

**Port Talbot ATE
Eagle Street
Port Talbot
West Glamorgan
SA13 1AA**

Site Reference NCO-0008030

CELLNEX UK AND MBNL

Cellnex UK

May 2024

1. INTRODUCTION

- 1.1 This statement is submitted in support of an application for planning permission for a 5G mobile base station for the mobile network operators (MNOs) EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL). The application site is operated by Cellnex UK, a radio site infrastructure provider.
- 1.2 The application includes:
- A description of the site and surrounding area
 - A description of the proposal
 - A statement of community engagement
 - A review of planning policy considerations
 - A review of design and access considerations
- 1.3 A number of other accompanying documents have been submitted in support of the application and these are referred to and should be read in conjunction with this statement.
- 1.4 This application is a resubmission of P2023/0548 which was withdrawn on 25/03/2024.

2. SITE AND SURROUNDING AREA

- 2.1 The application site is a former telecommunications installation on the roof of Port Talbot ATE, a three storey building in the central area of Port Talbot and is presently host to 3no. former antenna mounts. It was essential for the former antenna to be situated at this height on order to maximise coverage to the surrounds. In addition, the roof of Port Talbot ATE comprises a redundant equipment cabinet and redundant air handling plant. The northern section of the building is three storeys at a height of 14.7m and the southern section is two storeys at a height of 10.6m.
- 2.2 To the east of the site is Eagle Street and Tan Y Groes Street which comprise two-storey terraced residential dwellings. The buildings along Eagle Street face westwards and overlook the site, whereas the dwellings along Tan Y Groes Street face southwards and do not have a direct view of the site.
- 2.3 To the north of the site is Manor Street which comprises residential dwellings facing northwards. Views of the site are possible from the rear windows of the dwellings situated along the western section of Manor Street. Beyond Manor Street is Aberavon Rugby Football Club which includes four floodlight lattice towers.
- 2.4 To the west of the site is Plas Cwm Carw Care Home and Port Talbot Mosque & Islamic Centre which are both two storeys in height and situated along Oakwood Lane. Indirect views of the site are possible from windows facing the Telephone Exchange. Views of the site from the rear of residential dwellings beyond Oakwood Lane are not possible.
- 2.5 To the south of the site are further residential dwellings situated along Eagle Street, of which views of the site are not possible. Situated further south is the Royal Mail Group Building, The New Plaza Community Centre and Central Junior School.
- 2.6 The local and wider context of the site comprise a dense built environment on land which is flat in nature, resulting in long distance views of the site being limited. Port Talbot Parkway Rail Station and Port Talbot Bus & Coach Station are situated approximately 120m southwest of the site and Port Talbot Town Centre is situated 110m west.



Short distance view of the site from Tan Y Groes Street

- 2.7 The site is not within any Conservation Areas nor is it within or in close proximity to any statutory landscape designations or sites of nature conservation interest. The grade II listed Grove Place Chapel is situated 55m westwards and the grade II listed Plaza Cinema is situated 6m southwards.
- 2.8 In this case, EE and Hutchison 3G, through their joint network sharing partnership, MBNL, have asked Cellnex to obtain the required landownership and town planning approvals necessary to implement a new base station at the Telephone Exchange. As explained in the subsequent sections of this statement, the mobile network operators are required to upgrade their existing infrastructure to meet the technical and operational demands of 5G connectivity and also to enhance the 4G network. This is the reason for the application now before the Council.
- 2.9 A review of the Council's online planning record for the site are summarized below:
- Application reference: P2022/0636 – Planning approved in 2022 for the provision of storage container at Port Talbot Telephone. Container to house materials and equipment to support the local telecoms infrastructure network upgrade.
 - Application reference: P2005/1830 – Planning approved in 2005 for the installation of louvre panels within existing window opening of existing telephone exchange building.
 - Application reference: P2023/0548 – Planning withdrawn on 25 March 2024 for the installation of 12 No. antenna at a maximum height of 18.7m along with ancillary

equipment thereto including RRUs, BOBs, MHAs, GPS antenna, 0.6m dishes and equipment cabinets. The Case Officer requested that the application was withdrawn and resubmitted with an accompanying Noise Assessment.

3. THE 5G PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a new 5G electronic communications base station. The deployment of 5G will additionally provide 3G and 4G as part of the MNOs operating networks. As such, the application site is likely to carry different mobile connectivity services in parallel, with high data uses operating through the new 5G higher capacity network apparatus subject of this application.
- 3.2 Unlike earlier generations of mobile connectivity, 5G has more significant technical and operational requirements and this has implications on the amount, height, position and design of the new base station apparatus on the rooftop of the building. To help explain this important detail, we have set this out in the accompanying **‘5G Technical Support’** document, which must be read in conjunction with this planning statement.
- 3.3 The principal elements of the proposed development at the application site reflect these various siting and design factors within the technical support document. The following apparatus is proposed to be installed on the roof of the Telephone Exchange:
- Existing 3No. Antenna Mounts to be removed
 - Installation of 2No. Antenna at 18.1m and 2No. Antenna at 16.4m on proposed tripod
 - Installation of 2No. Antenna at 18.1m and 2No. Antenna at 16.4m on proposed tripod
 - Installation of 2No. Antenna at 18.7m and 2No. Antenna at 17m on proposed tripod
 - Installation of 6No. 0.6m Dish at 16.6m
 - Installation of GRP Platform
 - Installation of 1No. MK5B Link AC Cabinet, 1No. 6130 Cabinet, 1No. Airo Cabinet and 1No. 20kW PSU Cabinet on proposed beams
 - Installation of 13No. BOBs, 12No. RRUs, 12No. Multi MHAs, 6No. MHAs, 4No. ERSs, 6No. Multiplexers and 2No. GPS Antenna (Ancillary Equipment)

- Existing redundant equipment cabinet to be removed
- Existing Multi-User Cabinet to be re-energised

3.4 The apparatus proposed is not coloured green (the antennas or transmission dish) or blue (Tripods or GRP Platform), as drawn on the submitted drawings, but have been shown this way for illustrative purposes only to allow for a better appreciation of the proposed development. The respective materials and finishes for the apparatus proposed are as follows:

- The proposed antennas are made of aluminum and will appear light grey
- The transmission dishes are made of aluminum and faced in off-white
- The GRP Platform is made up of untreated galvanized steel that will weather to a dull grey colour, but can be finished in a different colour if required.

3.4 The radio equipment housing will need to be mechanically ventilated to avoid overheating of equipment. The ventilation equipment is only likely to operate during the day during hot weather.

3.5 A Noise Assessment has been prepared by Apex Acoustics which concludes that based on the current development proposals, it is calculated that the proposed development would cause a low impact at noise sensitive receptors. The worst case calculated BS 4142 rating level at the NSRs is 4dB below the measured background level during the daytime period and equal to the background level during the night-time period, which indicates a low impact. Considering the context of the existing acoustic environment the assessment result indicates the likelihood of a low impact, on the basis of implementing the proposed noise control measures.

3.6 The Welsh Code of Best Practice on Mobile Network Development, published in March 2021, explains how mobile networks operate. In the annual network rollout information supplied, the operators will have explained their network requirements and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK. It is only when these avenues have been exhausted that a search may be made for a new site.

- 3.7 The Welsh Code of Best Practice goes on to state that once an MNO has identified a requirement for a new installation, a suitable and available site must be identified. Elements that make a site favourable include: 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. Planning authorities should therefore consider these issues and balance the need for a site within a limited search area with the greater public benefit of improved connectivity. In general, it should not, therefore, 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.
- 3.8 The application site has been selected by the operator as this will provide the required level of 5G network coverage while properly meeting national town planning policy objectives for the shared use of existing electronic communications sites, in this case operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 Planning Policy Wales 11, TAN19 and the Code of Best Practice require a consultative approach to network development with the local planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received an amber score when assessed against the traffic light rating model.
- 4.2 In our engagement letter we sought to agree with you the appropriate traffic light rating and associated engagement requirements with the local community, and obtain your comments on the siting and design of the development.
- 4.3 Regrettably we have not received any formal pre-application responses from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.
- 4.4 Our best practice engagement with the local community entailed engagement letters which were sent to local ward councillors, Central Junior School and the Plas Cwm Carw Care Home on 19.06.23.

5. PLANNING POLICY

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

- National Policy, especially Future Wales: The National Plan 2040 (FWNP) & Planning Policy Wales Edition 11 (PPW)
- The local Development Plan, which comprises the Neath Port Talbot County Borough Council Local Development Plan (2011-2026) – Adopted in in 2016
- Swansea Bay City Deal – Digital Infrastructure Programme
- Planning Policy Wales Technical Advice Note 19 Telecommunications
- The Welsh Code of Best Practice on Mobile Phone Network Development

5.2 From these documents can be discerned the general policy background that exists for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development. As planning authority, you will be familiar with this framework and so in the interests of brevity, we do not rehearse it back to you in detail, but address instead the principal themes to demonstrate that the application accords with them.

National Support for Modern Communications

5.3 There is significant UK Government support for the delivery of 5G, particularly as this new connectivity will be a step change from earlier generations of mobile connectivity and will be critical to economic growth and sustainable communities. Our accompanying document of national policy '**National Policy – Delivering Ultra Fast Broadband Mobile Connectivity**' sets out how 5G mobile connectivity will help underpin the UK Digital Economy and the significant social, economic and sustainability benefits of advanced modern connectivity. it is essential that the planning system looks to support and facilitate new 5G base station installations such as that proposed to meet the Government's Digital Strategy. In addition, modern connectivity, such as 5G, will be essential to help the Government meet its wider sustainability and climate change targets and we explain this in more detail in our accompanying document '**5G – Helping tackle climate change**'.

Balancing operational and environmental considerations

- 5.4 The special operational and technical factors that require specific siting of a 5G base station should be balanced by the need to minimise environmental and visual impact.
- 5.5 The longstanding policy to minimise the potential environmental impact associated with electronic communications development is to avoid the unnecessary proliferation of new radio masts and sites. This policy objective is backed with the statutory obligation placed upon operators to share apparatus, where practicable. This is set out under General Condition 3(4) of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. As a consequence, the starting point for planning new 5G networks or the expansion of existing networks is, therefore, to use existing electronic communications sites owned by other operators or radio site management companies, such as Cellnex UK. In addition, the possibility of using other high structures is also looked at.
- 5.6 In this instance, the avenues for the use of an existing electronic communications site within the target coverage area were exhausted and a new site was therefore required. The new site in question is of suitable use due to its former use as a telecommunications installation, ready access to a power supply, access to fibre optic cables, an existing vehicular access and the roof capacity to support the development proposed.
- 5.7 Within this context the apparatus will be seen as an acceptable and justified use, reflecting all of the considerations within paragraphs 5.2.1 – 5.2.16 of Planning Policy Wales Edition 11. The target coverage area has been explained and consequently the special operational and technical requirements of 5G necessitate siting of a new apparatus within it. All reasonable steps have been taken, through careful siting, to moderate the visual impact of the development, having regard to technical and operational factors of 5G.
- 5.8 As a matter of principle, the development proposed is in accordance with the relevant policy framework and should be therefore be acceptable. In the next section, the Design Considerations are reviewed to demonstrate that the detail of the development is also acceptable and that in accordance with the presumption in favour, planning permission should be granted.

Local Policy Considerations

Neath Port Talbot County Borough Council Local Development Plan (2011-2026)

5.9 At local level, the proposal has been considered against the Neath Port Talbot County Borough Council Local Development Plan, which was adopted in January 2016. The proposed development has been assessed against the planning policies contained within the adopted Development Plan that guide development. The below policies are considered relevant and discussed below.

5.10 Policy SP 4 relates to infrastructure and states that *“Developments will be expected to make efficient use of existing infrastructure and where required make adequate provision for new infrastructure, ensuring that there are no detrimental effects on the area and community.*

Where necessary, Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable.”

5.11 Policy BE 1 relates to Design and states the following:

All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
- 2. It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
- 3. It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
- 4. It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*
- 5. Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*

6. *It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
7. *It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
8. *It uses resources, including land and energy, as efficiently as possible through: (a) Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area; (b) The layout and form of the development does not preclude the reasonable use of other adjacent land; (c) Developing brownfield land in preference to greenfield land where possible; (d) Minimising building exposure while maximising solar gain.*
9. *Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;*
10. *The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.*

5.12 Policy SP 21 relates to the Built Environment and Historic Heritage and states the following:

"The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. *Encouraging high quality design standards in all development proposals;*
2. *Protecting arterial gateways from intrusive and inappropriate development;*
3. *Safeguarding features of historic and cultural importance;*
4. *The identification of the following designated sites to enable their protection and where appropriate enhancement:*
 - a) *Landscapes of Historic Interest;*
 - b) *Historic Parks and Gardens;*
 - c) *Conservation Areas;*
 - d) *Scheduled Ancient Monuments; and*
 - e) *Listed Buildings and their curtilage."*

Swansea Bay City Deal – Digital Infrastructure Programme

- 5.13 The Swansea Bay City Deal Digital Infrastructure Programme highlights the rollout of 4G/5G across the region addressing both mobile coverage and capacity issues. The programme is keen to work with MNOs and Neutral hosts to address any mobile capacity issues identified in the region.

6. DESIGN CONSIDERATIONS

- 6.1 The local development proposed is exempt from the requirement to provide a design and access statement under Article 7 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, as amended. However, to assist your consideration of the detail, this section provides a description of the process adopted in the design of the proposals and explains the access considerations.
- 6.2 The development relates to the installation of 12No. Antenna on proposed tripods at a former telecommunications installation on the rooftop of Port Talbot Telephone Exchange. With regard to the main component elements of the development proposed, we highlight the following:
- The height and design of the proposed tripods is led by operational and technical factors of 5G, whilst the development will be evident from some vantage points, such as from the residential dwellings along Eagle Street and Manor Street, the tripods will only be partially visible depending on the vantage point due to the roofline. Although the chosen design will be visible, its design is considered less visually intrusive than an alternative lattice mast which will be more bulky in design
 - Views of the proposed development from the grade II listed Plaza Cinema would be limited. The site cannot be seen from the historic frontage of the Plaza situated on Talbot Road, whilst the rear of the Plaza holds no historical significance.
 - Views of the proposed development from the grade II Grove Place Chapel would be possible when viewing the Chapel from Grove Place Road. However, the degree of harm on the listed building should be considered as minimal compared to detrimental as the proposed development is 65m westwards and would only be partially visible due to the roofline.
 - The proposed development is functional in nature and responds directly to Policy BE 1 which relates to High Quality Design and allows the apparatus to assimilate with its surroundings as best possible.

Alternative Sites

- 6.3 Technical requirements have dictated the siting of the proposed equipment. The operator has spent a considerable amount of time identifying a potential site and the Telephone Exchange is considered to present the best balance between operational/technical requirements and environmental impact. There are no existing suitable telecommunications installations for the operator to share, that would provide the necessary coverage to the target coverage area.
- 6.4 Given that the surrounding area predominantly comprises terrace housing, there is a limited amount of tall buildings capable and available for a telecommunications installation within the cell coverage area which could be used as an alternative. Therefore, the applicant is seeking to optimise the Port Talbot Telephone Exchange which was formerly used for telecommunications infrastructure.
- 6.5 All aspects of the proposed development are necessary in order to meet the coverage requirements. If reduced, a new base station would be required elsewhere within the coverage area, leading to an unnecessary proliferation of masts.

Design Principles and Concepts

- 6.6 The scale, layout and design of the development has been guided by the special 5G technical and operational factors affecting the need to provide coverage to the local area, having regard to the need to minimise visual impact, already referred to above explained in detail in the '**5G Technical Support**' document.
- 6.7 For example, the numbers of antennas and their size is the minimum amount of development required to provide the required level of coverage for the 5G mobile network. The proposed siting of the apparatus also takes account of technical and other considerations, including the following:
- Three tripods comprising 4no. Antennas each (including 5G antennas) have to be installed on the northern section of the roof of the Telephone Exchange at the specific heights to meet the coverage requirements. This is the most efficient configuration of equipment at the lowest height open to the operator.
 - The antennas are similar to existing electronic communications apparatus installed on similar sites, such as The BT British Telecom Telephone Exchange situated on Rosser Street (NGR E: 275549 N: 197685) which is illustrated in

the below image. There is a requirement for the proposed height of 18.7m in order for the antenna to clear the surrounding built environment and for the antenna to be close to the edge of the rooftop to meet the especial technical and operational requirements of 5G and meet ICNIRP compliance.



Westwards viewpoint of the BT British Telecom Telephone Exchange situated on Rosser Street

- All apparatus has to be maintainable in accordance with general health and safety requirements including the CDM regulations.
- All apparatus has to be installed in a structurally feasible manner.
- All apparatus has to be clear of existing features on the roof such as access points, air conditioning units, roof lights, or other electronic communications apparatus.
- All apparatus has to be installed in accordance with the requirements of the building occupier.

6.8 The design options have been examined within those technical parameters, having regard also to the overriding aims set out in paragraph 67 of TAN19 with the principle of minimising contrast between equipment and its surroundings. There are a number of suggested ways in which apparatus might be installed on a building. The following design approaches have also been considered but rejected for the reasons given:

- Flagpoles

Flagpole designs incorporate an omni directional antenna, i.e. one that transmits and receives over 360 degrees. Such an antenna system has poor operational characteristics, with reduced data handling capacity and reduce geographical coverage. In this case, such an antenna system would not satisfy the operational requirements of 5G and if utilised could result in the need for a further base station.

- Mock Chimneys

The use of mock chimneys has been explored, but has been discounted for design reasons. In particular, the antennas have to be located at particular locations on the building and a series of mock chimneys at these points would look odd, as they would look incongruous on the building and would not replicate sympathetically the normal design of buildings with chimneys.

- Face Mounting

The occupier of the building will not allow face-mounted antennas to be installed due to concerns that damage could occur to the structure of the building. In addition, the building is not sufficiently high and clear of obstacles to enable the face mounting of antennas, which need to have a clear view over the wider area to provide the necessary coverage.

- Central Mounting

The possibility of mounting the antennas centrally in a single group has been explored. This would necessitate the use of a stub mast or a support frame. Such structures would have to have an overall height of around five metres to ensure ICNIRP compliance across the roof, as explained above. On a building of this scale, such a structure would not be an appropriate solution.

- Screening Solutions

The possibility of screening the apparatus, by way of a false storey or roof made of radio transparent glass reinforced plastic (GRP) has been examined. However, because the building is already dominant in its surroundings, such an option would not be a sympathetic solution in this case.

6.9 With regard to the main component elements of the development proposed:

- **Kept in proportion to the building or structure**

The scale of the apparatus is not large and when installed should look proportionate to the structure as a whole. They will therefore be seen in the context of this apparatus and will not appear as incongruous or jarring additions to the building.

- **Respect architectural style**

Within the severe technical constraints the apparatus shall be installed in a manner that respects architectural style. Architecture and its style are about function as well as pure design. The telephone exchange was designed to provide local connections to the electronic communications networks. Mobile phone base stations are a more modern wireless form of telephone exchange, but still require many of the operational attributes present. The development proposed therefore fully reflects the function of the exchange and the apparatus proposed can be viewed as an evolutionary requirement. In similar fashion, for example, a railway station, i.e. development required for another form of communications, which now may form part of our built heritage still has to evolve in accordance with new technology and safety requirements. In turn these translate into an array of structures that were often never envisaged when first built.

- **Have minimal impact above the roofline commensurate with technical constraints**

The apparatus that projects above the roofline has been kept to the minimum having regard to the technical parameters and design considerations explained above.

- **Not be detrimental to views and general skyline**

A combination of design, topography and the surrounding built environment should help keep any perceived changes to views and the skyline to within acceptable limits. Indeed, within the context of this urban location the attention of the casual observer is likely to remain be focused more upon the streetscape.

- **Avoid creating clutter**

The apparatus should not look unduly cluttered and insofar as it might be visible it will be viewed as operational electronic communications equipment compatible and now expected on a building designed and constructed exclusively for electronic communications purposes.

- **Use clean lines and maintain symmetry**

The apparatus has clean lines and has been sited to maintain symmetry with both the building and its different elements.

Antenna Array

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

Equipment Cabinets

- The number of radio equipment cabinets and their size has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the antenna systems and dishes that they support. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access Considerations

- 6.10 Access to the site will be provided by the existing vehicular entrance to the Telephone Exchange from Eagle Street.
- 6.11 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.12 In accordance with all relevant health and safety legislation and guidelines, access to the site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff.

Electronic communications base stations are specifically designed to prevent unauthorised access by members of the public and, therefore, there is no requirement to incorporate inclusive access arrangements into the proposed layout and design of the development.

Landscaping

- 6.13 The proposed siting of the development has been very carefully chosen to minimise environmental impact. Any potential impact of the development is principally associated with the tripods and antenna, which are the most visible components of the base station, and which cannot be fully screened for operational reasons. Each tripod will replace the former antenna mount in the same rooftop location, as it has already been established by the Council these sitings are acceptable. The height of the apparatus on the rooftop means that any attempt to screen it in its entirety would be unrealistic in any event.
- 6.14 There are various items of linear street furniture in the locality such as streetlights, road signs and the floodlights which form part of Aberavon Rugby Football Club. These items of street furniture will help the tripods assimilate with the surrounding area.

Appearance

- 6.15 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, as indicated above the local topography and built environment should help minimise views. Insofar as the apparatus may be visible they should look straight forward in appearance and reflect its function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure, such as roads and railways.
- 6.16 The proposed development is therefore considered to strike the best balance between meeting the specific network requirements for the operator(s) and minimising environmental impact.

HEALTH AND SAFETY

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

8 SUMMARY AND CONCLUSIONS

- 8.1 In summary, this application relates to the installation of EE Limited and Hutchison 3G UK Limited's electronic communications base station on the roof of the Port Talbot Telephone Exchange to provide 4G and 5G coverage to the surrounding area of Port Talbot. The public interest of the system is clear from the considerable benefits that will flow and it makes a significant and major contribution towards national and local sustainable objectives. Mobile connectivity is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more than 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.2 The operators' requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.3 As is demonstrated in this Town Planning Statement, any visual impact associated with the proposed apparatus should be acceptable in the planning balance and will be favourable when compared to an alternative designs. It supports the effective use of a rooftop site formerly used as a telecommunications installation to accommodate well-designed and suitably located mobile digital infrastructure. Hence the proposed development is in accordance with National and Local Policy.
- 8.4 The operator's requirement is in the context of network needs associated with a 5G cellular system. These impose particular locational and siting requirements which are even greater with 5G. The technical justification clearly demonstrates the need for this apparatus proposed within the context of the operator's surrounding network.
- 8.5 The operator(s) has followed national and local planning policy and best practice guidance in the siting and design of its apparatus in recognition of the need to minimise visual impact. This has included:
- Network planning based upon existing sites, including those controlled by Radio Site Management companies like Cellnex UK.

- In the absence of any suitable or available electronic communications site, utilising a suitable alternative location, brought forward in accordance with policy and best practice advice.
- Engagement in accordance with the Code of Best Practice procedures and guidance in PPW 11 and TAN19
- An examination of design options to try and minimise potential visual impact.

8.6 The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. There are no exceptional circumstances in this case and therefore no need to consider health effects and related concerns such as the perception of risk further.

8.7 This statement and the other accompanying material has demonstrated that the proposal is in accordance with local Development Plan policy and national policy set particularly PWW 11. In particular it is a form of development that is specifically encouraged as a matter of principle and in its detail complies with the policy objective of minimising potential environmental impact.

8.8. In conclusion, the application is for sustainable development, acceptable as a matter of principle and appropriate in its detail and so one which the presumption in favour of granting planning permission applies.