

Town Planning Statement

5G Electronic Communications Base Station

Proposed at:

**Mountain Road
Baglan
Pentyla Baglan
Neath Port Talbot
SA12 8HP**

Site Reference: NCO-0009334 - Baglan Mountain Road

Hutchison 3G UK Ltd

23rd September 2024

1. INTRODUCTION

- 1.1 This statement is made in support of a planning application for a 5G upgrade to a mobile base station for the mobile network operator Hutchison 3G UK Ltd. 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.

2. THE SITE AND SURROUNDING AREA

2.1 At present it is paramount that digital connectivity is supported and maintained throughout the country. In particular the current massive shift in user demand from city centres and places of work to residential areas and suburbs, requires an improvement in coverage and capacity throughout the whole network. The current proposal therefore provides the necessary equipment upgrades and additional capacity for the 5G network.

2.2 The applicant would also like to stress in the modern world it is imperative that communications are not only maintained but also improved to ensure capacity and real time data is at the forefront. Telecommunications is considered as a critical service as it is providing data to network operatives, field engineers, call centre staff, IT, data infrastructure and 999 and 111 critical services. This installation will allow telecommunications infrastructure providers to assure quality, capacity, and operational performance so that customers have uninterrupted access to crucial mobile and broadband services, specifically at this critical time.

2.3 The proposal is for a new ground-based telecommunications installation at Mountain Road, Baglan, Pentyla Baglan, Neath Port Talbot, SA12 8HP. The site comprises of an area of greenfield, the proposed location shown in Figure 2.1. The site is situated within a rural setting with only two properties being within the immediate vicinity to our proposed site. Our site does not possess any planning designations, however we are aware that our proposed site is located within a Safeguarded Minerals M1 - Safeguarded Category 1 Sandstone Resource and M1 - Safeguarded Coal Resource. As such we understand the importance of these designations and believe that we have taken the necessary care and attention to the surrounding area in the sitting and appearance of this proposed development and believe that no adverse impacts would be felt in this area.

2.4 It is considered that the least visually intrusive solution has been put forward via the proposed new ground-based installation and ancillary equipment. It is important to note that in addition to being the sequentially preferable solution, by utilising this location the proposed telecommunication mast will fit in within the existing network configuration thereby eliminating the need to introduce additional base stations within the Neath Port Talbot area. These works are essential to facilitate new 5G technology in the area.

Figure 1 – An image to show the surrounding area around the existing telecommunication site (indicated by the purple marker). Extract taken from Grid Reference Finder.



Figure 2 - An image to show the proposed location for our telecommunication development. Extract taken from Google Images.



3. THE PROPOSAL

- 3.1 The development proposed is shown in detail in the drawings submitted and is for a replacement to an existing electronic communications base station, to provide 5G to the local area of Neath Port Talbot.
- 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 ground based base station. 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:
- Decommission and removal of existing tower with the addition of a new 20m SSTMN Tower on a pad foundation in extended 7m x 7m area, 2No Antennas, 1No RBS Cabinet, 1No Meter Cabinet, Cable Tray and associated ancillary equipment (1No GPS Antenna, 6No BOBs and 8No ERS's and 2No. Filters). Relocation of existing equipment to the new tower.
- 3.4 As necessary, any uncontaminated earth and materials excavated will be reused for fill and levelling.
- 3.5 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. If it is considered specific noise attenuation measures to be necessary, we would be pleased to discuss practicable solutions.
- 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 for 5G and the anticipated use of existing sites, including those owned by radio site infrastructure providers like Cellnex UK.
- 3.7 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 masts and sites,
in this case owned / operated by Cellnex UK.

4. PRIOR ENGAGEMENT

- 4.1 Planning Policy Wales 11 and the Welsh Code of Best Practice require a consultative approach to network development with the planning authority and local community, reflecting the particular sensitivities of any given site. The proposal received a 'green' grading when assessed against the traffic light rating model as referenced in the Code of Practice.
- 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 response from your authority and accordingly we would be pleased to address any necessary matters within the determination period of the application.
- 4.4 The Pre-application engagement started on the 9th September 2024 for a consultation period between the below stakeholders. To the best of our knowledge there were no issues raised during the consultation. The Pre-consultation information consisted of the upgrade drawings, Pre-consultation Site Details Sheet and a letter describing the proposed works.

The Pre-consultation information was sent to the following:

- Neath Port Talbot County Borough Council Planning Department
- Education Establishments:
 - St. Joseph's School and Sixth Form Centre
- Ward Councillors for Baglan:
 - Councillor Peter D.Richards
 - Councillor Susanne Renkes
 - Councillor Carol Clement-Williams

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 & Planning Policy Wales: Edition 11 (PPW)
- The local Development Plan, which comprises The Neath Port Talbot County Borough Council Local Development Plan (2011-2026)
- 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. To deliver improvements to existing services and supporting future mobile technologies, 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 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 Although a new mast is required in this instance, this will be at an existing site owned or managed by Cellnex UK, where there are existing operations which are suitable for electronic communications use by virtue of the existing structures. The development entails the use of an existing site owned or managed by Cellnex UK which is in operational use and where a mast is already an established feature of the site and wider landscape. Within this context the new mast 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 and:
- The 5G base station is required as part of a national mobile communications network, necessary to extend and improve mobile connectivity to the local area;
 - The target coverage area has been explained and consequently the special operational and technical requirements necessitate siting of a mast within it;
 - All reasonable steps have been taken, through careful siting at an existing Cellnex UK communications site, to moderate the visual impact of the development, having regard to technical and operational factors. In this case, there is an existing telecommunications site adjacent to the proposed new mast which indicates that telecommunications installations are an accepted feature within the landscape;

- 5.7 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, prior approval should be granted.

NATIONAL PLANNING POLICY:

Future Wales – The National Plan 2040

This national plan demonstrates continued government support for telecommunications infrastructure and recognises its importance. Specifically, Policy 13 – Support Digital Telecommunications and Policy 14 – Planning in Mobile Action Zones are relevant to this proposal.

“Changing technology: Digital Infrastructure

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 and since 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.

In rural areas the provision of both mobile telecommunications and broadband infrastructure is particularly important where topography, physical distance and sparse distribution of population make the roll-out of infrastructure and access to key services and facilities difficult. Little or no coverage in some locations disadvantages businesses, communities and individuals, both economically and socially, and can contribute to deprivation, social isolation and lack of well-being. Planning Authorities should consider the potential impact of poor coverage on different groups and plan positively to overcome these issues, setting out policies in Strategic and Local Development Plans to aid infrastructure delivery. The Welsh Government supports the provision of new and improved digital communications infrastructure across Wales and recognises that infrastructure in rural areas should be carefully planned to mitigate any environmental impact on sensitive or designated landscapes.

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. The Welsh Government's fast broadband roll-out improves coverage to business and domestic premises across Wales. Mobile Action Zones will help create the right environment to achieve increases in mobile telecommunications coverage where there is currently little or no service, predominantly in selected parts of rural Wales.

Due to the essential nature of broadband in modern society, the Welsh Government supports the provision of Gigabit capable digital infrastructure into new developments. Typically, this will apply to developments where people are present, for example new housing, business and commercial premises, and public buildings. Local Development Plans should include policies to help deliver this.

'Gigabit capability' will give developers some flexibility over the type of technology that is deployed; for the most part this is likely to be fibre, but could also include fixed wireless access. For the former this will mean that the developer will need to install underground ducting allowing the communications provider to install fibre, and for fixed wireless infrastructure the communications provider may need to erect a mast and/ or install small antennae. This helps negate the need to retro-fit developments in the near future to accommodate fibre or any newer technologies that arise.

Planning authorities must also be alert and responsive to the positive effects of forthcoming 5G services and Gigabit broadband and other such technologies. They should work with infrastructure and service providers to consider the potential impacts of these technologies and the needs of business, public services, communities and individuals. These issues should be addressed in planning authorities' Strategic or Local Development Plans.

The Welsh Government supports the need to increase mobile phone coverage and to ensure all parts of Wales are supported by the mobile telecoms infrastructure they need. The identification of Mobile Action Zones identifying areas of little or no coverage will highlight areas, many of which will be rural in nature, where there is demand for new infrastructure and provide a focus for action..."

Local Policy Considerations

- 5.8 The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) adopted January 2016 has been reviewed and did not highlight any specific legislation regarding telecommunications infrastructure and development for the area, however it was noted that a key priority for the region is “improving accessibility. This includes improved telecommunication links.” Furthermore, Strategic Goal 6 wishes to improve the transport and communications infrastructure, ensuring that the area of Port Talbot maximizes its locational advantages and brings benefits to the economy and people of the area. Our proposed development aims to help deliver this key priority through improving the efficiency of telecommunications within the region.

1.2.8 The key priorities for the region are:

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

- 5.9 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.

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.

Physical Context

- 6.2 The proposed site has been carefully selected in a position capable of providing the required coverage. The scale of the proposed equipment will be marginal and has been kept to a minimum whilst ensuring that the necessary coverage is provided for the area. The visual effects have been mitigated as we wish to utilise the mature trees around the compound which will aid in assimilating the proposal.

Design Principles and Concepts

- 6.3 The scale, layout and design of the development has been guided by the special 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. With regard to the main component elements of the development proposed:

5G Mast Design

- The design of the proposed mast is led by operational and technical factors of 5G. Whilst the lattice structure proposed will be evident from any near views, the latticework will help ameliorate presence over distance, especially from views where there is a background or foreground of vegetation. That said, the local topography will limit such views from public vantage points and any sensitive visual receptors.
- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical

infrastructure also found in the landscape, the mast proposed is a benign structure: it is much lower than the television broadcast masts that Cellnex UK own and operate; it is lower and does not form a sting of structures that march across the countryside like pylons; and it does not move like wind turbines, which are typically higher and are usually developed in clusters.

- Alternative designs like shareable tree masts have been considered, but they cannot accommodate the amount of apparatus necessary to support 5G. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

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 5G 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

- 6.4 Access to the site will be provided from the M4 and thereafter the A Road network, to the minor road through Sea View Terrace to the established track - Mountain Road. These existing routes do not require any amendment as part of the development proposed

- 6.5 Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 6.6 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

- 6.7 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 radio mast, which is the most visible component of the base station, and which cannot be fully screened for operational reasons. The height of the mast means that any attempt to screen it in its entirety would be unrealistic in any event.
- 6.8 At ground level, this structure will be set amongst the backdrop of mature, dense trees which will aid in reducing the proposed installations visual impact and will mitigate its impact in views from public vantage points nearby. The use of a lattice tower, which is a relatively open and permeable structure, will give the impression of allowing views through the mast to the backdrop of trees and the sky, thereby minimising its visual impact. While we understand that the present equipment is noticeable, we ensure that the replacement equipment has little further visual impact while providing the area with the most recent 5G coverage. As a result, extra landscaping is not thought appropriate and has not been incorporated into the concept.
- 6.9 At ground level, the compound will be set amongst existing natural screening that will minimise its visual impact. For this reason, additional landscaping is not considered appropriate and has not been included within the scheme.

Appearance

- 6.10 The sensitive approach to siting and design should minimise the appearance of the development proposed. 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.

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 owned or 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 prior approval.

8 SUMMARY AND CONCLUSIONS

- 8.1 In summary, the application is in respect of a proposed 5G electronic communications base station necessary to improve a vital network that provides public services. The proposed works seen below are to deliver an improved service for the local area:

Decommission and removal of existing tower with the addition of a new 20m SSTMN Tower on a pad foundation in extended 7m x 7m area, 2No Antennas, 1No RBS Cabinet, 1No Meter Cabinet, Cable Tray and associated ancillary equipment (1No GPS Antenna, 6No BOBs and 8No ERS's and 2No. Filters). Relocation of existing equipment to the new tower.

- 8.2 The service provided by the operator is in the public interest and is in very high demand with 5G being the next and highly significant advancement in mobile connectivity. In the UK there are now more almost 92.5 million subscriptions to mobile networks and mobile services now exceed fixed landlines in terms of customer numbers and usage.
- 8.3 The public interest of the system is clear from the considerable benefits that will flow, and it makes a significant and major contribution towards sustainable objectives.
- 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.
 - Siting our proposed development adjacent to an existing electronic communications site to minimise new sites and help avoid the unnecessary proliferation of new radio masts and sites for them.

- Engagement in accordance with the Code of Best Practice procedures and guidance in PPW 11.
- An examination of design options to try and minimise potential visual impact.
- The replacement of an existing radio mast (decommission and removal of existing tower), compared with the alternative of erecting a new mast and the development of an associated compound on a site nearby and with it the associated additional resources in developing a new site.

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, particularly PPW. 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 prior approval applies. We believe this proposed development which is situated next to an existing 5.5m high telecommunications installation is fully compliant with The Neath Port Talbot County Borough Council Local Development Plan (2011-2026) and we urge the LPA to approve this telecommunication upgrade.