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Our ref: JDH/NGT/DowlaisTop

Merthyr Tydfil Borough Council
Town Planning Division
Unit 5
PENTREBACH
CF48 4TQ



15 June 2026

Via Planning Portal (PP-14861121)

Dear Sir / Madam

SUBMISSION OF AN APPLICATION FOR PLANNING APPROVAL

**NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WALES) PLC AND NATIONAL GRID TELECOMS LIMITED
DOWLAIS TOP RADIO SITE, NATIONAL GRID DOWLAIS GRID 132KV/ 33KV
SUBSTATION, CASTLE ROW, DOWLAIS TOP, MERTHYR TYDFIL, CF48 3PU
NGR – 307211, 208804**

On behalf of National Grid Electricity Distribution (South Wales) plc and National Grid Telecoms Ltd, we submit herewith an application for planning permission for the development of replacement electronic communications apparatus at the above site.

The planning application has been submitted via the Planning Portal along with the following plans and documentation:

- The planning application forms, including the relevant landownership and agricultural holdings certificates.
- A location plan.
- Existing site plan
- Proposed site plan / block plan
- Existing and Proposed elevations.
- The prescribed fee has been paid electronically as part of the Planning Portal process.
- A certificate of ICNIRP compliance.
- Various photographs of the existing site.

At present, National Grid operates its telemetry and backhaul services for the security and protection of the electricity distribution network across South Wales via a number of major hub sites, one of which is Dowlais top which is currently a 32.5m high lattice tower. Additionally, mobile phone and emergency services radio networks share this piece of critical national infrastructure. Unfortunately the existing structure is at structural capacity and is incapable of supporting the weight of the additional equipment required by both its own additional essential LTE equipment and the mobile phone networks' required upgrading of their services.

Thus the existing 32.5m high structure must be replaced with a marginally taller 35m high structure to accommodate all users essential network upgrades. Once the replacement structure is fully built, all operators equipment is live and operational on the replacement structure, the old 32.5m functionally obsolete mast will be removed.

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Design and Access Statement

The design of the apparatus has been guided by the technical and operational requirements of the operator's system having proper regard to minimise appearance. The replacement apparatus proposed will not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points since the replacement site is at a marginally lower ground height and in general terms the use of the site with a 32.5m tower has been accepted within the landscape for a number of decades.

The new apparatus required will not bring about any additional requirements with regard to access. Access to this operational site will therefore remain the same as the current arrangements whereby engineers park within the NGED compound area.

In accordance with all relevant health and safety regulations and guidelines, access to the site is restricted to authorised personnel and access for maintaining or servicing all the apparatus can only be carried out by properly trained and qualified staff. Such routine operations will continue to be carried out roughly once a quarter, with no requirement to increase this arising out of the development proposed. The application does not therefore give rise to any public issues associated with access.

As the apparatus proposed will continue to lead to improvements to a public service provided in the local area, the application merits support and accords in all respects with national and local planning policy.

This application has been prepared in accordance with National Planning Policy (PPW) together with Future Wales: The National Plan 2040 and in particular Policy 13 (Digital Infrastructure). Furthermore, this application is identified as the most suitable option that balances operational need with local planning policies and national planning guidance.

Notification under the Electronic Communications Code Regulations

This letter and the enclosures also provide due notification under Regulation 5 of the Electronic Communications Code (Conditions and Restrictions) Regulations 2003, as amended. In particular, you are given notice of the intention to install the electronic communications apparatus described in more detail in the application documentation (including the scale drawings) and to be located as shown on the application plans. No fee is required for this separate statutory notification.

As clearly demonstrated within the application and accompanying Supplementary Information Template, the applicant believes that it has fully justified the circumstances required to allow the full planning permission for the retention of the development.

We would be willing to meet to discuss the merits of the application, or to assist with any visits of the site and surrounding area, if this is beneficial to the determination of the application.

As the proposal entails the development of infrastructure necessary for the delivery of vital public services, we ask that you progress the determination of this application in an expeditious manner and request that you use your delegated powers if available.

We trust everything is in order, but if you do require any further information or clarification, please do not hesitate to contact our Jonathan Haddrell.

Yours faithfully



NEEDHAM HADDRELL
For and on behalf of
NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WALES) PLC AND
NATIONAL GRID TELECOMS LIMITED