

SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	Cnoc Na Dail	Site Address:	Land at Cnoc Na Dail
National Grid Reference:	E: 198368 N: 629049		Off the Ross Glenkiln Isle of Arran North Ayrshire KS27 8NX
Site Ref Number:	EAS0138	Site Type: ¹	Macro

2. Pre-Application Check List

Site Selection

Was an LPA mast register used to check for suitable sites by the operator or the LPA?	Yes	
If no explain why:		
N/A		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/A		

Site Specific Pre-application consultation with LPA

Date of written offer of pre-application consultation:	12.05.2020
Was there pre-application contact:	Yes
Date of pre-application contact:	04.06.2020
Name of contact:	Neil McAteer

¹ Macro or Micro

Summary of outcome/main issues raised:

In an email dated 06 June 2020, the LPA advised:

'The proposed mast would be over 35m in height and so would require planning permission. The proposed site is in the Countryside, as identified in our North Ayrshire Council Local Development Plan (LDP), adopted in November 2019 <https://preview-northayrshire.cloud.contensis.com/Documents/CorporateServices/LegalProtective/LocalDevelopmentPlan/ldp2.pdf>

The site is not affected by any site specific policies or proposals in the LDP but may be within the Monamore Glen/Slidderly Water Local Nature Conservation Site. Proposals under the ESN program are acceptable in principle and the relevant LDP provisions in assessing the application would be: Strategic Policy 1: the Countryside Objective (p.12, Policy 16: Protection of our Designated Sites (p.82) and Policy 26: Digital Infrastructure and New Communications Equipment (p.92). Policy 26 in particular sets out the requirements for site selection for telecoms sites.

The indicated site is within a forestry area so, although the mast is quite tall, it may be able to be sited against a backdrop of trees to an extent if technological requirements allow. A supporting statement should be included with any application to address these issues. In the current lockdown circumstances, site visits to the island can't be carried out so it would also be useful if any application could also be accompanied by photographs showing the site in the local landscape context'.

Community Consultation

Rating of Site under Traffic Light Model:	Green	Amber	Red
Outline of consultation carried out (include evidence of consultation):			
Consultation with local Ward Councillor's for Ardrossan and Arran, the local MP Patricia Gibson and Kenneth Gibson MSP Pre-application consultation letters and drawings of the proposals were sent to these parties on the 12.05.2020.			
Summary of outcome/main issues raised (include copies of relevant correspondence):			
In an email dated 13.05.2020, Cllr Billings advised that he would share the consultation with the Chair of Arran's Community Council and requested information on alternative sites. Alternative sites are considered at Section 6 of this Supplementary Information document.			

School/College

Location of site in relation to school/college (include name of school / college):
No schools nearby.
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 Defence/Aerodrome Operator consultation (only required for an application for prior approval)

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

Developer's Notice

Copy of Developer's Notice enclosed?	N/A
Date served:	N/A Full Planning Application

3. Proposed Development

<p>The proposed site:</p> <p>Background</p> <p>The new blue light service, to be known as the Emergency Services Network (ESN), will be delivered across England, Scotland and Wales. ESN is being procured competitively to provide a high-quality service that makes full use of the latest 4th generation (4G) technology in the telecoms sector and has a number of related projects to provide the capability, resilience and security required for what will be a key part of the Critical National Infrastructure (CNI) supporting public safety.</p> <p>Most of the UK will be covered directly by EE who are in the process of upgrading their commercial networks to deliver ESN. Largely because of demographics and geography, there exists a number of areas in the country which have not been populated with mobile communications infrastructure. It is these 'not-spots' which are addressed by the Extended Area Services (EAS) project.</p> <p>The EAS project extends the coverage provided by EE by procuring, on behalf of the Home Office, telecommunications infrastructure in these defined but primarily rural, remote and commercially unviable areas where little or no MNO coverage exists. The Home Office is acting as the prime contractor to contract with Acquisition, Design and Build (ADB) suppliers (Lendlease for EAS sites) and will further contract with transmission suppliers for their backhaul. Sharing existing telecommunications sites is being negotiated where possible, but EAS coverage needs will require mainly new greenfield sites, which the Home Office will then own and operate for Government use. EE will install their active equipment on these EAS sites and connect this to their core ESN network.</p> <p>EE are at liberty to offer their own commercial services to the general public from these EAS sites, but are under no obligation to do so. The Home Office understands that a number of stakeholders, not least local residents, would be in favour of receiving a commercial service from the new sites so it has undertaken to build, wherever possible, an enhanced design so as to allow subsequent mobile network operators to share the sites and provide commercial</p>

services with the minimum of further works required. The site to which this application refers is one of these where an enhanced, future-proofed design has been submitted.

Proposed Development

The Home Office are looking to progress works which will entail the installation of a new 35.0m lattice mast supporting 3 no. antennas, 2 no 600mm dishes, together with a proposed Foul weather enclosure, 1 no meter cabinet, satellite dish and ancillary development thereto including a permanent generator, housed within a secure compound. The proposal is required as part of the Extended Area Services network, an integral part of the Emergency Services Mobile Communications Programme.

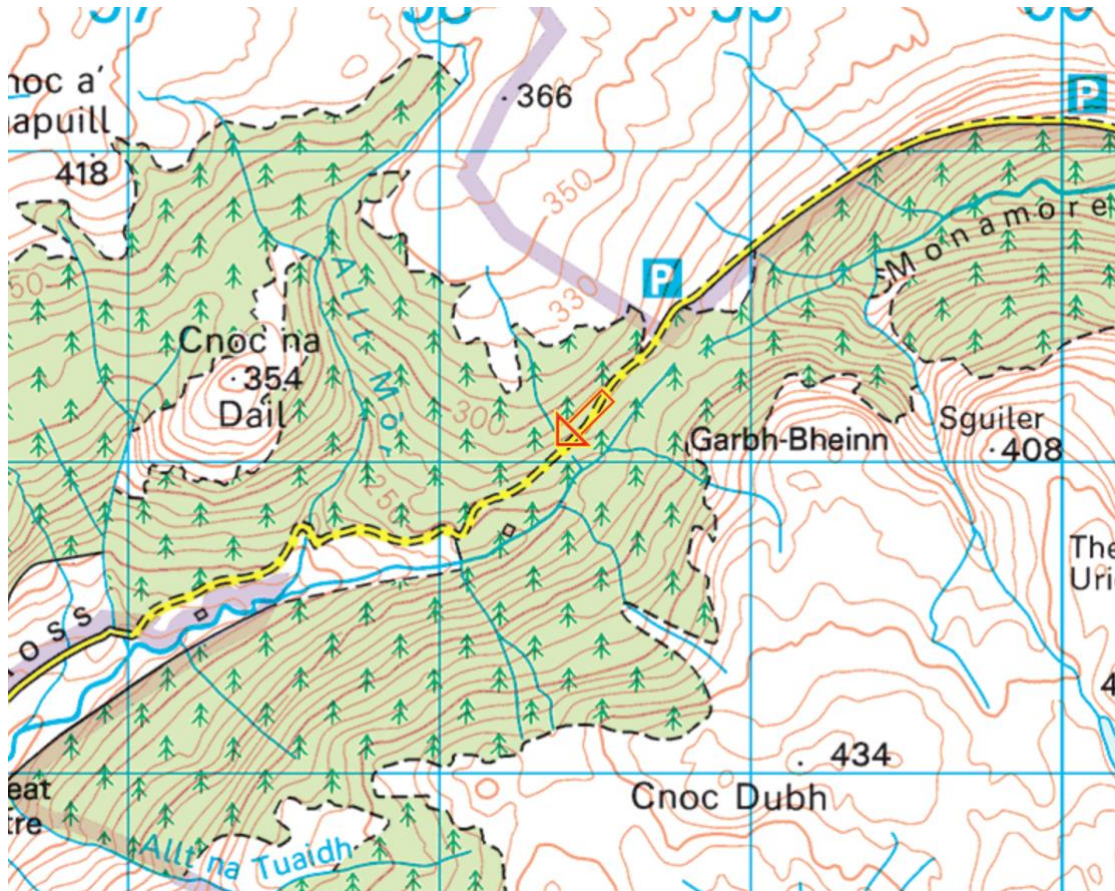


Figure A: Site Location in context of Cnoc Na Dail and the surrounding area



Figure B: Site Location at Cnoc Na Dail

The proposed site is located in a secluded position on land at Cnoc Na Dail located to the north of Ross. As illustrated by Figure A above Cnoc Na Dail is located on higher ground. Indeed, the topography of the search area typically comprises hills interspersed with minor roads. The area is used almost exclusively as woodlands. The application site is located with forestry land which provides an effective backdrop to the installation when viewed from the surrounding area.

The site is not constrained by any national or local planning designations.

The new site, part of the Emergency Services telecommunications network will provide uninterrupted, high quality emergency communications to the target area. This site is located here to help provide extended contiguous coverage to the road running from Lamlash to the south west coast road. This road is known as the Ross and is a well used short cut for public and 3ES alike. It will also cover the surrounding forestry cycle and walking trails and the surrounding area.

The site has been chosen in this location, as it is located in a secluded location on rising land adjacent to woodland which forms a backdrop to the installation in both local and longer views. Coniferous trees provide some vertical emphasis whilst also offering a clear unobstructed view to much of the surrounding area.

Enclose map showing the cell centre and adjoining cells:

Refer to coverage plots which form part of this submittal pack.

Type of Structure: Lattice Mast

Description:	
<p>The Home Office are looking to progress works which will entail the installation of a new 35.0m lattice mast supporting 3 no. antennas, 2 no 600mm dishes, together with 3 no ground based equipment cabinets contained within a Foul Weather Enclosure, 1 no meter cabinet, satellite dish and ancillary development thereto including a permanent generator, housed within a secure compound.</p> <p>Notably, all equipment can be painted to LPA requirements.</p> <p>Details of the proposed equipment are detailed below.</p>	
Overall Height:	35.0m (top of structure) 36.30m (t/s antennas)
Height of existing building:	N/A
Equipment Housing: Foul Weather Enclosure	
Length:	Refer to Plans
Width:	Refer to Plans
Height:	Refer to Plans
Equipment Housing: Generator (x1)	
Length:	Refer to Plans
Width:	Refer to Plans
Height:	Refer to Plans
Materials:	
Tower/mast etc – type of material and external colour:	Lattice (steel) – Galvanised
Equipment housing – type of material and external colour:	Cabinets – Green

Reasons for choice of design, making reference to pre-application responses:
<p>The choice of design at this site has been influenced by the location of the proposed site and the requirement to provide uninterrupted, high quality emergency services communications coverage to the target area. This site is located here to help provide extended contiguous coverage to the road running from Lamlash to the south west coast road. This road is known as the Ross and is a well used short cut for public and 3ES alike. It will also cover the surrounding forestry cycle and walking trails and the surrounding area.</p> <p>A lattice mast with open head frame is proposed at this location as it is more efficient at providing the required coverage and capacity, than a structure which shrouds the antennas from view. The lattice design can accommodate the equipment required by the Home Office with the capacity to accommodate additional users in the future. This design therefore allows the expansion and improvement of the electronic communications network, where necessary, to continually maintain a high-quality telecommunications service in line with the aims of the Scottish Government to provide a high-quality superfast information highway network.</p> <p>Shrouding the antennas would lead to unwarranted inefficiencies. As such, it is not considered reasonable to reduce the ability of this site to maximise the opportunity of providing the necessary coverage to the target coverage area. This is especially true given the significant social and economic benefits of providing the latest high quality 2G, 3G and 4G mobile service provision to the Ross and the surrounding area.</p> <p>The proposed structure will be 36.3m to top, which is the necessary height required to ensure that the antennas can meet the emergency services communications network and mobile</p>

network operators' coverage demands in the surrounding area. Given the secluded siting adjacent to the woodland, the proposed lattice mast is considered to be an effective design solution as the construction allows light to pass through the structure, thereby helping to reduce the visual mass and bulk of the development when viewed from the surrounding environment. The design will also help the structure assimilate into the woodland, which will provide some further vertical emphasis.

The transmission dishes are to be located underneath the antennas close to the top of the main tower and will each be 600mm in diameter. They are required in order to provide a link in to the network. Without these transmission dishes the site could not be connected to the grid and therefore an alternative location would need to be sought. In order to obtain a clear line of sight the dishes need to have a centre line height of 31.75m in order to clear the natural clutter in the surrounding area. If the transmission dishes were to be any lower in height then they would not be able to link in to the applicant's network and the radio base station would not be operational. Therefore, an additional site would still be required leading to the proliferation of masts in this area, contrary to local and national guidance.

The dimensions of the proposed mast are the thinnest available to support the required antennas and associated equipment at this geographical location, while also having structural capacity to accommodate additional equipment, if required by additional operators or future changes to the emergency services communications network.

The proposed lattice mast will have a galvanised steel finish which will naturally dull to a dark grey colour over time. The proposed equipment cabinets are considered small for telecommunications equipment, and as such will not be prominent in the wider landscape.

This colour scheme is considered to be the most appropriate finish to reduce contrast with the surrounding rural environment.

The design of the proposed tower is to blend in to this woodland setting. The mast will be galvanised and as such will assimilate the typical sky colour at that time in the area. However, this mast can be finished in any other colour if the LPA considers another colour to be more appropriate. It is therefore considered that the proposal before you strikes a good balance between environmental impact and Home Office operational considerations. The proposed height and design represents the best compromise between the visual impact of the proposal on the surrounding area and the requirement to provide meeting the continuous, high quality services required for the emergency services telecommunications network. A section of 3.5m wide track is proposed for Forestry Commission use as part of this application.

4. Technical Information

ICNIRP Declaration attached	Yes	No
<p>ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines.</p>		
<p>When determining compliance, the emissions from all mobile phone network operators on the site are taken into account.</p>		

5. Technical Justification

Enclose predictive coverage plots.

Reason(s) why site required e.g. coverage, upgrade, capacity (map attached if required):

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 county.

There is a specific requirement for a new radio base station at this location to provide new uninterrupted, high quality emergency services communications coverage to the target area. The new site, part of the Emergency Services telecommunications network will provide uninterrupted, high quality emergency communications to the target area. This site is located here to help provide extended contiguous coverage to the road running from Lamlash to the south west coast road. This road is known as the Ross and is a well used short cut for public and 3ES alike. It will also cover the surrounding forestry cycle and walking trails and the surrounding area.

Coverage plots form part of this submittal pack and set out:

Plot 1) Map of area with search area identified by a red circle

Plot 2) Coverage Key

Plot 3) Coverage deficiency in target area when the surrounding network of ESN sites have been deployed

Plot 4) Major Road Service Level across much of the search area when the combination of ESN sites and application site have been deployed

Plot 5) Coverage from the application site in isolation

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

In accordance with the Home Office requirements and advice in SPP and NPF3 the following site selection procedures apply to each new installation to identify and sequentially discount alternative site options:

1. Following a technical review which identifies need, Home Office radio planners undertake a desktop analysis to identify the best way of meeting the site requirement. This is completed by using computerised radio propagation modelling tools. These tools show every site on the existing networks and identifies those areas where insufficient ESN signal level exists or where there is a need to increase capacity.
2. A desktop search of the area with the coverage deficiency identifies other operators' existing telecommunications installations. This process ensures any mast or site sharing opportunities are maximised. Where available the planning authority's mast register is also reviewed.
3. The Home Office radio planners define a search area, which is then issued to Clarke Telecom, through Lendlease, to undertake a detailed ground search to identify suitable site options to meet the coverage deficiency.
4. Clarke Telecom undertake a detailed ground survey to produce a report identifying viable site options which combine the following requirements: location within or close to the search area; a willing landlord with acceptable commercial terms; adherence to planning and environmental policy; and other site specific issues such as initial power and link availability and buildability. These options are then assessed by the Home Office, taking into account the suitability in coverage terms; potential available antenna height and surrounding obstructions.
5. A design survey provides a full structural analysis of the proposed site location including confirming access and power routes; and how the site will be linked into the surrounding ESN network and a set of planning drawings are produced.
6. Discussions are offered to the local planning authority to consider local policies and any protected areas and to agree additional public consultation if required.
7. A plan for local consultation is drawn up, and where appropriate, a consultation exercise is undertaken with the local community.
8. Terms are discussed and finalised with the landowner before a formal planning application is submitted to the planning authority.

As far as technically and operationally possible, The Home Office is committed to ensuring that the number and visual impact of the telecommunications sites required for the emergency services communications network is minimised.

The Home Office issued a nominal site location of E:198200, N:629300 as the centre of the new site search to meet the emergency services coverage requirement to the Ross, and surrounding area.

Alternative sites considered and not chosen:

Site ²	Site Name and address	NGR	Reason for not choosing ³
GF	North-West Gar'Bheinn	E 198719 N 629390	The site would not provide the required levels of coverage to the target area.
GF	East Cnoc na Dail	E 197713 N 629318	A site in this location would be in the felled area of the forest, there is no suitable nor viable access to site location. Accordingly, the site was discounted on suitability grounds.

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

As referred to above, the applicant has taken a sequential approach and has demonstrated there are no other more suitable, available or deliverable options which meet the operational requirements of the Emergency Services Network.

It is noted that in determining an appeal brought by Orange PCS (now part of EE Ltd) against Stafford Borough Council, the Planning Inspectorate addressed the issue of considering alternative sites. In allowing the appeal the Inspector stated in addressing local plan policies *"Nor do I consider it is realistic or reasonable to take the view that the absence of consideration of every possible option and alternative would mean that this policy is complied with ...PPG8 does not indicate the need to embark on an examination of every possible alternative in an iterative process The adequate analysis of feasible sites is a more realistic approach"*. (APP/Y3425/A/02/1084110).

Land use planning designations:

See below for further details.

Additional relevant information (planning policy and material considerations):

The Scottish Government series of Planning and Architecture documents are material considerations in the planning system. The Scottish Government's policy on nationally important land use planning matters is identified in Scottish Planning Policy 2014. The National Planning Framework 3 (NPF3) is the Governments current strategy for Scotland's long-term spatial development.

The SPP and NPF3 are pro – development with a '**presumption in favour of development that contributes to sustainable development**' being seen as a golden thread, running through both plan making and decision taking'.

The thrust of this guidance is positive and a reminder to LPAs that we need to build the requisite infrastructure to enable economic growth.

² ETS – Existing Telecomm site, ES – Existing Structure, RT – Roof Top, GF – Greenfield

³ SP – Site Provider, RD – Redevelopment Not Possible, T – Technical Difficulties, P – Planning, O - Other

It is not necessary to quote extensively from this document but the following points are highlighted.

National Planning Framework 3 (2014)

The NPF3 was adopted 23 June 2014. It identifies a vision for Scotland to create a sustainable, low carbon, connected, natural resilient and successful place (Paragraph 1.2).

The Government's latest thinking strongly supports digital infrastructure and the need to ensure that cities are better connected, providing a gateway to the rest of the world. Paragraph 5.16 identifies that cities are expected to become 'smarter' in the future and will use shared infrastructure and population density to further increase access to high performing digital services. Through strengthening digital infrastructure, the aspirations for more sustainable cities and subsequently attracting new business will be supported. Furthermore, NPF3 highlights the significance of improving digital infrastructure to support sustainable economic growth and ensure people and communities are better connected (Paragraph 5.25).

The following paragraphs are of significance:

Para 5.8 – “Connectivity is not just about enabling physical movement, but also virtual links. High quality mobile and fixed broadband connections have become essential to support communities and business development in both rural and urban areas. At present, there remains a significant gap between our most and least connected areas, with digital access being considerably better in more accessible urban areas. Many parts of rural Scotland have little or no connection and require public investment to rebalance the distribution of infrastructure.”

Para 5.9 – “Our Infrastructure Investment Plan aims to accelerate the roll out of next generation broadband to all parts of rural Scotland over the next five years, to support public service provision as well as investment in the digital economy and rural economic growth. Work is progressing to develop new fibre links connecting rural areas, with an expectation of fibre links to 95% of premises Scotland wide by 2017/18. Opportunities for smarter towns and cities are also being explored.”

Para 5.15 – “To further reduce the need to travel and ensure continuing economic competitiveness, we will see a step change in digital connectivity in the coming years, supporting our broader aspirations for growth across the country. This will require significant investment in digital infrastructure to ensure coverage extends to our most remote, but asset-rich, rural and island communities. As well as providing new infrastructure to connect existing areas, future developments will build in digital connectivity as a matter of course. We are extending permitted development rights to facilitate this.”

Para 5.16 – “Strengthened digital infrastructure will support our aspirations for more sustainable cities which attract new business. We can expect cities to become significantly 'smarter' in the next few years, using population density and shared infrastructure to further increase access to high performing digital services.”

Para 5.29 – “Our plans for investment in digital infrastructure will play a key role in improving competitiveness, ensuring that there is no digital divide between rural and urban Scotland. Our 'Digital Scotland Superfast Broadband Programme' is delivering £410 million of public and private investment in parts of Scotland, including rural, semi-rural and suburban areas, that would not otherwise be served commercially. We are also exploring delivery models to extend mobile services to some of our hardest to reach areas.”

Para 5.35 – *“Improved digital infrastructure, both fixed and mobile, is essential to support sustainable economic growth and better connect people and communities. We have identified a digital fibre network linking our most peripheral communities as a national development. This will bring particular benefits in the north and west coasts and islands, given their relatively dispersed population and the potential to support population and economic growth through increased home and remote working.”*

Scottish Planning Policy 2014 (SPP)

Scottish Planning Policy published June 23rd 2014, is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP is supplemented by a series of Planning Advice Notes (PANs).

Paragraphs 292 – 300 of the SPP relate specifically to Supporting Digital Connectivity, including telecommunications developments. It highlights the importance of our digital infrastructure, across the whole of Scotland, including urban and rural areas and confirms that Scotland's economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.

The proposed development accords with all these aspects of the NPF3 and SPP in that it will provide EE and the 3ES with new and improved network provision within the KW7 area of the Highlands bringing a range of associated economic and technical benefits.

Paragraph 295 of the SPP confirms that *Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment. They should ensure that the following options are considered when selecting sites and designing base stations:*

- *mast or site sharing;*
- *installation on buildings or other existing structures;*
- *installing the smallest suitable equipment, commensurate with technological requirements;*
- *concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and*
- *installation of ground-based masts.*

In accordance with paragraph 295 the applicant has demonstrated that there are no suitable, available or deliverable existing sites and this proposed new installation is justified.

Policy 296 confirms that “Local development plans should set out the matters to be addressed in planning applications for specific developments, including:

- an explanation of how the proposed equipment fits into the wider network;
- a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- details of the design, including height, materials and all components of the proposal;
- details of any proposed landscaping and screen planting, where appropriate;
- an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation (*The radiofrequency public exposure guidelines of the International Commission on Non-Ionising Radiation Protection, as expressed in EU Council recommendation*

1999/519/ EC on the limitation of exposure of the general public to electromagnetic fields.); and

- an assessment of visual impact, if relevant”.

It is considered that the applicant has addressed all matters set out in the ‘model’ telecommunications policy.

In assessing applications for developments, paragraph 298 of SNP confirms that “Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy”.

Paragraph 299 of SPP states: “All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. The cumulative visual effects of equipment should be taken into account”.

Paragraph 300 of SPP states “Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration”.

Planning Advice Note: PAN 62 Radio Telecommunications

Pan 62 refers to Radio Telecommunications and states that the NPPG considers the general siting and design principles for telecommunications. It states that such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surroundings; *minimising contrast between equipment and people’s expectations of a particular scene and minimising the contrast between equipment and its immediate setting or background*. For example, a lattice mast generally fits expectations about industrial landscapes and fitting antennas to an electricity pylon or painting antennas to match the façade of a building can reduce contrast.

Paragraph 33 identifies ways in which to minimise this contrast, these are as follows:

- *select a shape and material appropriate to the character of the area;*
- *keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;*
- *develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;*
- *minimise the number of separate visual elements in a base station; and*
- *use regularity, order and symmetry in positioning equipment*

Furthermore, paragraph 34 identifies a series of options that should be considered as a guide for selecting the site and design of telecommunications that minimise contrast operators. The implementation of telecommunications is site-specific and therefore should be considered

against the site conditions and coverage and capacity requirements in addition to technical constraints and landscape character. The options are;

- *installing small scale equipment;*
- *concealing or disguising equipment;*
- *mast sharing;*
- *site sharing;*
- *installing on existing buildings or other structures; and*
- *erecting a new ground based mast.*

Local Policy

The Development Plan for the North Ayrshire area consists of the Local Development Plan (Adopted 2019). The plan sets out how the Council aims to guide development and investment in the area over the next 20 years.

The site is not affected by any site specific policies or proposals in the LDP but may be within the Monamore Glen/Sliddery Water Local Nature Conservation Site. Proposals under the ESN program are acceptable in principle and the relevant LDP provisions in assessing the application are:

Strategic Policy 1: the Countryside Objective

Policy 16: Protection of our Designated Sites

Policy 26: Digital Infrastructure and New Communications Equipment

Strategic Policy 1 relates to 'the Countryside Objective' and states (inter-alia):

'We also recognise that, in general, countryside areas are less well suited to unplanned residential and other developments because of their lack of access to services, employment and established communities. We will seek to protect our prime and locally important agricultural land from development except where proposals align with this spatial strategy. In principle, we will support proposals outwith our identified towns and villages for:

c) developments with a demonstrable specific locational need including developments for renewable energy production i.e. wind turbines, hydroelectric schemes and solar farms'

Policy 16 relates to 'Protection of our Designated Sites' and states (inter-alia):

'Protection of our Designated Sites Policy 16: We will support development which would not have an unacceptable adverse effect on our valuable natural environment as defined by the following legislative and planning designations

c) Nature Conservation Sites of Local Importance Development adversely affecting Local Nature Reserves or Local Nature Conservation Sites will generally not be permitted unless it can be demonstrated the overall objectives of the designation and the overall integrity of the designated area would not be compromised, or any adverse effects are clearly outweighed by social, environmental or economic benefits of local importance'.

Policy 26 relates to 'Digital Infrastructure and New Communications Equipment' and states:

We want to encourage the provision of digital infrastructure to new homes and business premises to create a universal world class network that is future-proofed in line with the Scottish Government's World Class 2020 document and the roll-out plans of digital communications

operators, community groups and others, such as the Scottish Government and the UK Government.

We will support proposals for new communication equipment, particularly those addressing areas with low or no connectivity capacity or coverage where they:

- i) Would deliver new services or provide technological improvements
- ii) Would not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. and;
- iii) are sited and designed to keep environmental impacts to a minimum.

Providers of communications equipment will require to adequately demonstrate that the following options have been considered in site selection and design of a base station(s):

- i) Mast or site sharing.
- ii) Installation on buildings or other existing structures.
- iii) Installing the smallest suitable equipment, commensurate with technological requirements.
- iv) Concealing or disguising masts, antennas, equipment housing and cable runs using design camouflage techniques where appropriate.
- v) Installation of ground-based masts.

Planning Assessment

The following paragraphs set out how the proposed scheme fully complies with Planning SPP, NPF3, and policy 26 of the Local Development Plan.

From the outset, it should be appreciated that irrespective of the development's use as a communications site, the installation of a new tall structure will always be, to some degree, a noticeable addition in the local area. However, it should be recognised that visibility or a development's siting and appearance, does not automatically result in an overwhelming adverse harm. In order to minimise the visual impact of the proposed telecommunications installation, the mast has been located in an elevated but also secluded position above the target coverage area outside statutory and local land designations. It should be acknowledged that this height is an operational necessity in order to ensure that the antennas have clear line of sight to the surrounding area.

In accordance with Scottish Government Policy and Guidance, a sequential approach to site selection was undertaken, to consider the possibility of mast sharing or using an existing building or structure before a new ground based structure is proposed. There are no suitable existing telecommunications sites in this area and no suitable buildings or other structures available on which to mount the proposed equipment. Consequently, the only option to address the ESN coverage requirements within this area is for a new greenfield ground based mast.

The Scottish Government attributes considerable importance to keeping the quantity of masts and number of sites for such installations to a minimum, consistent with the efficient operation of the network. Furthermore "the sharing of masts and sites is strongly encouraged. Therefore, this proposal offers the best environmental solution, limiting the number of new sites required whilst allowing additional communications users to utilise the same site in the future, limiting the visual intrusion in the area and providing high quality communications infrastructure.

Following a technical review of the search area, it was concluded that the proposed site that is subject of this application, is the best option available in terms of meeting the technical

requirements of ESN, while also minimising visual and environmental impact on the surrounding area.

The proposed installation will benefit from being viewed against the backdrop of a woodland, which will provide some vertical context and a visual backdrop to the proposed installation.

As far as technically and operationally feasible, it is considered that the proposal has been positioned and designed in a way that respects the character and appearance of the area. In light of the above it is considered that the planning assessment of this case should concentrate on whether the visual impact of the proposed development is significant as to outweigh other material planning considerations.

With regards the need for the development, ESN is providing critical national infrastructure to enable communications and interoperability for the police, fire and ambulance services in England, Scotland and Wales to help them cut crime, fight fires and save lives. The new ESN service will provide an integrated 4G mobile broadband data service using the latest generation of mobile technology. The Scottish Government encourage the growth and provision of modern communications infrastructure, in particular 4G, and it should be recognised that the ability for the proposed structure to accommodate additional communications equipment in the future is a key component that could aid social and economic prosperity.

The installation is located in an elevated position in a rural area within a woodland setting. However, this is where the strategic national importance of the emergency services network and its associated technical requirements need to be balanced against the visual impact. In order to reduce the visual impact of the proposed development a site has been selected outside an area which is afforded any special protection.

This woodland setting, together with the orientation away from residential properties and distances between these will ensure that the impact of the lattice mast and ground level equipment cabinets will be minimised. This will ensure that the proposal will not appear prominent in the landscape. Together with the colour and design choice for a 'see through' lattice tower the mast will not appear stark in the landscape and the visual amenity of the area will not be detrimentally affected.

Taking all matters into account, it is the applicant's opinion that any limited harm to the visual impact of this area as a result of the proposed installation would be clearly outweighed by need for this emergency services proposal as well as the future social and economic benefits that 4G services would bring to the locality when additional sharers utilise this mast.

Overall, it is considered that there is no more suitable site or design available in the area which would be acquirable, which would minimise impact on character and visual amenity while also providing the required level of ESN coverage to the target area and on that basis, it is considered that the proposal is in accordance with the requirements of national and local policy and guidance, and should therefore be approved.

Confirmation that submitted drawings have been checked for accuracy

Contact Details

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