



WHP Telecoms Ltd, 1a Station Road, Guiseley, Leeds LS20 8EY

Our ref: 238497

Date: 1st October 2021

The Director of Planning
Glasgow City Council
City Chambers
Glasgow
G2 1DU

Dear Sir /Madam,

Cellnex UK and EE Ltd and Hutchison 3G UK Ltd

Submission of an Application for Planning Permission

Proposed Additions to Existing Rooftop site at Linfern ATE, Linfern Road, Downhill, Glasgow, G12 9ND

On behalf of EE Ltd and Hutchison 3G UK Ltd, in conjunction with Mobile Broadband Network Limited (MBNL), we submit herewith an application for planning permission for the installation of 5G electronic communications equipment and associated ancillary development at the above site. This application follows the completion of our pre-application engagement exercise, reflecting so far as is practicable the guidance and comments offered.

We accordingly enclose the following:

- i. The completed planning application forms, including the relevant landownership and agricultural holdings certificates;
- ii. An O.S. site plan scale (1:2500) Reference: 238497 (164920-00-004_ML004 Rev4) showing the red line area;
- iii. Drawing Nos. 238497 (164920_02_100_MD023 Rev 23, 164920_02_101_MD023 Rev 23, 164920_22_150_MD023 Rev 23, 164920_02_151_MD023 Rev 23):
- iv. Electronic payment of £401.00 in respect of the appropriate fee
- v. 5G Technical Support document
- vi. National Policy – Delivering Ultra Fast Broadband Mobile Connectivity
- vii. 5G – Helping tackle climate change document
- viii. A certificate of ICNIRP compliance
- ix. 5G Health and Safety document

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The Proposed Development

The operators already provide coverage from an existing base station at this site but have a requirement to install the 5G electronic communications apparatus referred to in this letter and shown in the submitted drawings.

The deployment of 5G will utilise the Mobile Network Operators (MNOs) existing 3G and 4G networks such as the base station already existing at the application site. 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. As a consequence, this particular technical requirement is not one that can be met on an alternative site.

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. We explain this in more detail in the document '**National Policy - Delivering Ultra Fast Mobile Connectivity**' which supports this application. 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**'.

Supporting Statement incorporating Design Statement

The development proposed essentially involves engineering operations and so is exempt from the requirement to provide a design statement under Regulation 13(3)(b)(i) of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, as amended.

However, to assist your determination we provide a written statement about the **design principles and concepts** that have been applied to the development. The significant contribution such developments makes towards sustainable development objectives is clearly identified in Scottish Planning Policy.

The amount of development, its design and the location of the apparatus at this existing electronic communications site has been guided by the technical and operational requirements of the operators 5G system having proper regard to minimise appearance.

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. To help explain this important detail, we have set this out in more detail in our accompanying '**5G Technical Support**' document, which should be carefully considered.

Having regard to the nature and appearance of the structure as a whole, the proposed works should have no adverse impact, or no more than a minimal adverse impact, on its appearance. The 5G electronic communications apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points.

In bringing forward the proposal and suitable design, the relevant planning policy framework that has been taken into account and is found principally within the Council's Development Plan, Scottish Planning Policy, PAN62: Radio Telecommunications and PAN68: Design Statements. In terms of design, consideration has been given to the main issues (where relevant) as identified in page 11 of PAN68.

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Government policy on electronic communications which is set out in Scottish Planning Policy is to facilitate the growth of existing and new electronic communications systems such as 5G. It also seeks to keep the inevitable environmental impact associated with electronic communications development to the minimum and as such encourages the use of existing structures and sites to avoid the proliferation of electronic communication developments.

As the site falls within a designated area, consideration has been given to relevant guidance within Scottish Planning Policy. However, it is significant that even in these areas of greater sensitivity, electronic communications will still be required and permitted, and that LPA's should not lose sight of the economic and social implications of not having full coverage in an area.

In this case the operator is already located on the site and the additional apparatus is required to upgrade its existing installation to provide 5G.

Whilst alternative siting is not therefore a realistic proposition in this particular case and the sharing of the site fully accords with planning policy, proper care has been given to identifying the most suitable design. However, in this instance the design concept and principles are particularly guided by the special technical and operational requirements of the operators' systems.

The proposed 5G apparatus is generally small scale and of an unfussy design and can be installed onto the existing building without any significant modification to the structure and site. The additional apparatus proposed should not materially affect the overall appearance of the existing site to any noticeable or adverse degree from any public vantage points and there will be no demonstrable harm to the visual amenities of the area. Apparatus can be painted to minimise contrast if required.

The layout of the apparatus is shown on the attached plans and has been considered within the context of the existing site and surroundings. Overall this appraisal has brought forward the most appropriate design, form and scale of development.

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.

This letter and the enclosures also provide due notification, as may be required, under the relevant conditions 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.

We indicated in our prior engagement letter that the Traffic Light Rating was amber. The prior engagement carried out suggests this rating to be correct and we have not altered it.

Health and Safety

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 will be compliant with

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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.

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.

Scottish 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.


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 5G 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 please contact me if you require any additional information or clarification in relation to the proposed development.

Yours faithfully

Sam Wismayer
Planning Manager


On behalf of Cellnex UK

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