

**SITE SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name	Newtongrange	Site Address	NEWTONGRANGE, NEW VICTORIA PARK, DALHOUSIE ROAD, NEWTONGRANGE, MIDLOTHAIN, EH22 4RG
NGR	E 333112 N 664705		
Site Ref Number	GBR-MLN0001	Site Type <sup>1</sup>	Macro

2. Pre- Application Check List

**Site Selection (for New Sites only)**

(would not generally apply to upgrades/alterations to existing sites)

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:  The Ofcom database was not used as the proposal is for an upgrade to an existing nearby cell which is proposed to be removed pending positive determination.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: The site is currently used for hosting telecommunications equipment, so as in line with best practice an existing site has been chosen and is being redeveloped. The proposed development is consolidating equipment on to one single, multi-user mast.		

**Pre-application consultation with local planning authority**

Date of written offer of pre-application submission:	N/A
Was there pre-application contact:	N/A
Date of pre-application contact (meeting / response / e mail):	N/A
Name of contact:	N/A
Given the proposal is not for a standalone new mast and is replacing an existing installation which is already established and has previously been accepted by the LPA, pre-application advice was not sought from the LPA.	

## Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:			
<p>In accordance with the Code of Best Practice this site has been given a rating of Green. Existing installations which are being removed as part of this development in the same area, therefore the principle of telecommunications equipment has been established at this location. The proposal is consolidating equipment on to one single shareable mast, directly adjacent to the existing site.</p>			
Summary of outcome/Main issues raised:			
N/A			

## School/College

Location of site in relation to school/college:
The proposal is more than 200m away from any nurseries, schools and colleges.
Summary of outcome/Main issues raised:
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?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?	Yes	No
N/A		

## Developer's Notice

Copy of Developer's Notice enclosed	Yes	No
Developer Notice Attached		

## 3. Proposed Development

The proposed site:
<p><b>About Icon Tower Infrastructure Ltd (Icon Tower)</b></p> <p>Icon Tower is a UK based company, headquartered in Lichfield, Staffordshire who provide independent wireless infrastructure sites and equipment and also benefit from being an official Electronic Communications Code ('Code') Operator. It develops infrastructure for all networks to use on an open and non-discriminatory basis. Icon Tower is backed by infrastructure investors and has major plans to invest in digital infrastructure to improve mobile and wireless connectivity in both urban and rural areas. On this basis it provides local communities with the most efficient means to improve connectivity whilst minimising duplicative infrastructure deployments in the future. Icon Tower expects that other mobile operators, rural wireless broadband and other essential networks may also use the mast.</p> <p>Icon Tower does not operate a retail mobile network of its own and instead gathers Lease Premiums to develop its portfolio of infrastructure for the sole purpose of providing access to all wireless network operators on a shared basis. This is undertaken by Icon Tower Ltd's parent company, AP Wireless.</p>

AP Wireless' Investment Portfolio comprises thousands of sites across Europe, Asia, Australia and North and South America.

The four MNOs in the UK, together with over 100 other smaller networks, use Icon Towers infrastructure to deliver a wide variety of services ranging 2G, 3G, 4G and 5G mobile through to fixed wireless broadband, emergency radio services, broadcast and local wireless services.

Icon Tower is committed to the responsible development of wireless infrastructure. Alternative locations are assessed based on strict Town Planning criteria (visual amenity, impact on the local community), balanced against the physical requirements of the mast (radio plan coverage, backhaul line of sight, power and road access). We operate in accordance with the Code of Best Practice on Mobile Network Development (Nov. 2016).

International consultancy Ernst & Young highlighted in a recent report that the independent sector *"can play a valuable role in promoting effective infrastructure use – enabling lower costs, increased coverage for remote areas, and increased retail competition for mobile services"*. Ernst & Young further noted that the sector has *"a proven track-record in sharing towers with multiple network operators"* and referenced evidence that independent towers enable 2-3x more connectivity than towers deployed by traditional network operators. (Report on the economic contribution of the European tower sector" March 2015).

Supporting this application will therefore not only secure investment in a high-quality infrastructure asset for the community but also ensure that the mast is deployed by a Code Operator focussed on maximising the use of that infrastructure to enable ongoing improvements to connectivity over the long term.

### **UK Government Policy on Mobile Infrastructure Deployment.**

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they so require. With the advent of new technology, further advances are proposed, and central government has seen the telecoms industry, and 5G, to be at the forefront of economic development.

The expectations are that future telecom's technology will support government policy regarding digital inclusion; improvements in health and social care; assisting in local economic growth; advancing the development of Smart Cities and supporting innovative uses throughout the transport sector for both personal and public travel.

At the beginning of March 2017 the Department of Culture, Media and Sport (DCMS) issued an updated UK Digital Strategy ([UK Digital Strategy](#)) with the goal of ensuring that the UK delivers a *"world-leading digital economy that works for everyone"*. The strategy focuses on seven key strands:

- Building world-class digital infrastructure for the UK
- Giving everyone access to the digital skills they need
- Making the UK the best place to start and grow a digital business
- Helping every British business become a digital business
- Making the UK the safest place in the world to live and work online
- Maintaining the UK government as a world leader in serving its citizens online
- Unlocking the power of data in the UK economy and improving public confidence in its use

The government has noted within the Digital Strategy that the UK lags other similar nations in the delivery of fast, reliable, consistent connectivity for its population, wherever they are in the Kingdom. In conjunction with the new Electronic Communications Code (2018), the DCMS wishes to make it easier for operators to upgrade and share their equipment with other operators to help increase coverage. The DCMS also sees new technology and improved connectivity and coverage as key to the future growth, both socially and economically, of the UK.

Icon Tower is committed to following through on the Government's aims and to responsible development of wireless infrastructure. This submission forms part of private new investment where there is a specific requirement for an upgrade to the existing radio base station at this location to enhance coverage in the area.

**Description of the Site**



Existing site photo

The proposal is on the site of an existing 15m monopole mast and associated compound which will be replaced, at New Victoria Park, on the grounds of a football club. To the north of the site is Newbattle Abbey Conservation Area (approximately 160m away) and to the south-west of the site is Dalhousie & Cockpen Conservation Area (approximately 450m away). There is also Newtongrange Conservation Area, approximately 700m to the south east, which due to the distance is unlikely to be impacted. The site has a suburban-rural character, with an industrial area immediately to the east of the site. The site is surrounded by dense mature woodland consisting of evergreen trees, which provide screening from the Conservation Areas. There is also dense woodland along the B703 road, which naturally separates the proposed mast from the cluster of listed buildings approximately 1km to the north of the site within Newbattle Abbey Conservation Area, therefore they are unlikely to be impacted by the proposal. There is already a general acceptance towards vertical infrastructure in the area, as can be demonstrated from the existing 15m monopole mast, floodlights and streetlights on the football club's grounds. The B6482 road (approximately 80m to the south of the site) and the rail line between Eskbank station and Newtongrange station (approximately 100 m to the south of the site) provide an additional buffer between the proposed development and the housing to the south of the site, which is therefore unlikely to be impacted by the development.

**Proposed Development**

The proposal relates to: The removal of an existing 15m monopole mast and associated compound, and the installation of a replacement base station which includes a 30m lattice sharable mast, 6no. of antennas, 2no. of dishes, 7no. of cabinets, etc. Ancillary development thereto. This is needed as the existing mast cannot support the required equipment to improve connectivity.

Type of Structure: Lattice Frame

Height:	30m
Equipment Housing	7no. cabinets are part of this proposal
Equipment Housing Colours	RAL7035 (Can be changed to alternative RAL colour on request by LPA).
Column/mast etc:	Galvanised
Fencing	1.8m high palisade fence

**Reasons for choice of design:**

The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area. Further options such as a monopole mast were explored, however lattice masts tend to be better suited to more rural areas and are capable of supporting multiple operators' equipment, helping to reduce the likelihood of additional masts in the future and will permit for future upgrades and capacity in the future such as 5g. Icon Tower has subsequently deemed that a lattice structure will be better suited to the site. The proposed mast is suggested to remain galvanised in order to assimilate the typical sky colour in the UK, however the Applicant is open to suggestions from the LPA if they feel that there are any other suitable RAL colours to paint the mast.

For the base station to effectively provide coverage to the target area in line with the established network pattern, specific antenna orientations and heights, determined by Network Radio Planners, must be achieved. The mast height is determined by features of the surrounding area such as existing buildings and trees, the antenna must be able to 'see over' any obstructions in order that they do not block the signals from the antennas. To achieve operator's upgrade requirements the maximum height of the proposed antennae on the mast will be 30m. The size is determined by the technological requirements by the Operator, in order to provide the reliable signal with greater capacity, reliability and lower latency. The antennae are to be finished in the standard light grey finish, which matches the existing antennae on the installation and help reduce prominence when viewed against the sky.

There is already an acceptance of tall vertical structures in the area with the long-established 1no. telecommunications mast which indicates that the key consideration is the additional effect upon visual amenity, particularly the 15m height increase.

This proposal, coupled with the complete removal of 1no. existing mast will make an improvement to visual amenity in the area by condensing the potential number of telecommunications sites to one single mast. The additional height of the proposal compared to the existing is unlikely to impact on the surroundings as there is an abundance of screening from woodland around the site.

The applicant is a neutral party which allows other operators to install their equipment on to the proposed to future-proof the site.

It is, therefore, considered that the proposal strikes a good balance between environmental impact and operational considerations. The proposed height and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the site to deliver the capability for an enhanced service for multiple operators from a single network installation.

#### 4. Technical Information

<p>International Commission on Non-Ionizing Radiation Protection Declaration attached (see below) *.</p> <p>International Commission on Non-Ionizing Radiation Protection 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>The telecommunications infrastructure the subject of this application accords with all relevant legislation and as such will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest.</p>	<p>Yes</p>
--	------------

5. Technical Justification

**Enclose predictive coverage plots if appropriate e.g. to show coverage improvement.**

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

The existing masts cannot support the necessary upgrades. To prevent the proliferation of masts Icon Tower has decided to relocate all existing equipment to one new mast which has the capability for upgrades and the ability to host new and antenna systems and preparing the site for future innovations in telecommunication equipment.

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

The applicant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing masts is always progressed where it is technically and legally possible. New sites are only developed where there are no viable or accessible alternatives. The feasibility of the build and maintenance of the site also needs to be considered.

Improvements in telecommunications technology has led to the existing site becoming unsuitable for Icon Tower, as existing structures cannot support the required upgrades to the existing telecommunications systems currently located on the 1no. mast. To allow for these upgrades as well as future proofing the site for other potential Telecommunication innovations Icon Tower has deemed it necessary to construct a new mast with additional capacity. The additional 15m height is required to ensure none of the existing operators lose coverage as the antennas have to be relocated on to two new headframes on the proposed mast. The proposed height is also required to "see over" nearby trees which are particular problematic when broadcasting signal.

As the proposed development is to replace one existing telecommunication installations which is already established feature in the area, the applicant has kept the proposed new telecommunications on the site of the existing mast. As a result of this an option for a new lattice mast was deemed the best option. As the surrounding area is of semi-rural/suburban character a lattice frame mast was considered best practice as it permits views through the structure limiting visual impact.

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

As referred to above, the applicant has taken a sequential approach and is seeking to invest and redevelop an existing installation. It is considered that upgrading an existing, established radio base station installation is preferable to pursuing a second base station within the immediate vicinity and on that basis no alternative sites were considered.

It should be noted that the proposed development is proposing to replace existing installations on one single mast which is in full accordance with the Code of Best Practice for Mobile Phone Network Development in Scotland 2023.

Additional relevant information (planning policy and material considerations)

**Scottish Planning Policy 2014**

Scottish Planning Policy (SPP) 2014 sets out Government policy and confirms the importance of communications infrastructure for economic, environmental and social reasons.

Paragraph 292-300 of SPP relate specifically to supporting digital connectivity including telecommunications developments. It highlights the importance of digital infrastructure across the whole of Scotland, including both urban and rural areas and confirms that Scotland's economy and social networks depend heavily on high quality digital infrastructure.

Paragraph 293 confirms that the *"planning system should support:*

- *development which helps deliver the Scottish Government's commitment to world-class digital connectivity;*
- *the need for networks to evolve and respond to technology improvements and new services;*
- *inclusion of digital infrastructure in new homes and business premises; and*
- *infrastructure provision which is sited and designed to keep environmental impacts to a minimum."*

Paragraph 295 of 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 assessing applications for telecommunications development, paragraph 298 states 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 300 states that:

*"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 62: Radio Telecommunications

The proposal should be assessed in relation to guidance PAN 62: Radio Telecommunications which confirms the Scottish Executives intention to secure a world class telecommunications service in Scotland whilst safeguarding the environment.

PAN62 supports the sensitive siting of telecommunications equipment in both urban and rural areas as a way of reducing public concern for the development.

**DCMS & MHCLG (now called Department for Levelling Up, Housing and Communities)  
'Collaborating for Digital Connectivity' (March 2019)**

As indicated earlier Ministers from the DCMS and MHCLG wrote to all CEOs of Council's setting out their position in respect of supporting investment in high-quality, reliable digital connectivity.

The Government acknowledges that such infrastructure is essential for communities to benefit from faster economic growth and greater social inclusion.

### **UK government policy on mobile infrastructure deployment**

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

*"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go".* DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

Coverage commitments in the 4G LTE spectrum awarded to Telefonica O<sub>2</sub> (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017

National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017

Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.

Changes to the Permitted Development rights afforded to communications code operators (such as WIG) to allow new networks to be rolled out more efficiently.

Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

### **Code of Best Practice on Mobile Phone Network Development in Scotland (2022)**

The Code of Best Practice provides guidance primarily to mobile network operators, their agents and contractors and to local planning authorities in Scotland. It is also useful guidance in Northern Ireland, England and Wales too.

The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure is achieved in a timely manner, but in a way, that also minimises the potential impact that can be associated with such development. It provides clear and practical advice to ensure the delivery of significantly better and more effective communication and consultation between operators, local authorities and residents.

The Code highlights that the mobile telecommunications network is a key element of national infrastructure in both economic and social terms and a crucial component of everyday life. It states that *"coverage in rural area is recognised as a vital component for maintaining economic activity and social inclusion"*. It acknowledges that the pressure on networks to upgrade and improve networks through changes to existing sites and the development of new sites is constant. With the ever-increasing demand and the Government's ambitious aspirations it is becoming more important to improve connectivity and capacity.

Concerning the erection of new ground-based masts the Code provides examples of where the environmental and visual impact of the mast can be greatly reduced.

- *Placing the mast near similar structures. For example, industrial and commercial*



*premises, road signs and lamp posts;*

- *Placing a mast within or adjacent to an existing group of trees*
- *Using simple and unfussy designs. Masts which have complex designs are more likely to dominate and be in discord with the landscape and have adverse visual impacts; and*
- *Appropriate colouring. Masts seen against the sky, for example, are best left in their galvanised state or painted pale grey. Against a wooded backdrop a matt green or brown colour scheme would be more applicable.*

The proposed mast is considered to be an upgrade of the two existing masts and completely supports the National Policies of all four UK Nations by allowing numerous future operators to share one single site, keeping the network to a minimum. The proposed mast has been sited on the land of the existing installation. The proposed mast has been intentionally sited near trees which offer a great level of screening, particularly at the base of the mast which includes the fencing and cabinets.

### **UK government policy on mobile infrastructure deployment**

The UK government has identified the need for greater investment in mobile infrastructure to increase the widespread availability and capacity of mobile voice and data networks.

*“The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go”.* DCMS, May 2016.

The last few years have seen a number of UK-wide initiatives to improve coverage including:

- Coverage commitments in the 4G LTE spectrum awarded to Telefonica O<sub>2</sub> (February 2013) to deliver mobile broadband with 98% indoor premises coverage by the end of 2017
- National commitment by all four MNOs (December 2014) to deliver 90% geographic coverage by 2017
- Mobile Infrastructure Project (MIP) – investment by DCMS of up to £150m (to March 2016) in towers to deliver connectivity in complete mobile not-spots.
- Changes to the Permitted Development rights afforded to communications code operators (such as Icon Tower) to allow new networks to be rolled out more efficiently.
- Changes to the Electronic Communications to Code (December 2017) to allow mobile operators to more easily roll-out new communications infrastructure.

### **Midlothian Local Development Plan 2017**

Policy IT 1

Digital Infrastructure

Proposals for telecommunications developments will be supported where they are sited and designed to minimise environmental impact, taking into account:

- A. technical and operational considerations;
- B. the possibility of sharing existing telecommunication facilities, provided that this does not increase any adverse visual impact;
- C. the possibility of erecting ground-based masts or installing on an existing building or other structure;
- D. using slimline or the smallest suitable equipment, commensurate with technological requirements;

E. the availability of alternative sites;

F. concealing or disguising masts, antennas, equipment housings, etc., where appropriate;

and F. any other relevant policies.

### **Planning Assessment Compliance with Planning Policy**

The development has been designed to be compliant with Policy IT 1. The proposed development has reduced the possibility of criminal damage by the erection of a 1.8m high fence, limiting the ability for anti-social behaviour giving the site a better sense of safety therefore reducing the fear of crime within the locality. The proposed mast is capable of hosting multiple operators' equipment on one single mast, avoiding the proliferation of masts in the local area.

The proposed development arguably improves the design of the area as it reduces the need for multiple base stations in the area. Within the immediate surroundings of the site, there is a large quantity of vertical infrastructure, such as streetlights and floodlights. Size, scale, massing, orientation, materials and appearance have all been considered during the design process. The applicant is also allowing the LPA to suggest any alternative RAL colours of the mast structure, fencing and cabinets. Although the mast is taller than the existing at 30m compared to the 15m of the existing mast, this is mitigated by the lattice frame which allows views through the structure and is recognised as best practise in rural, semi-rural and industrial locations. Visual impact has also been reduced by the choice of colours and materials for this development for example the Fir Green (RAL6009) chosen for the base fencing blends with the vegetation surrounding the site, and the galvanised finish helps the lattice frame to blend with the sky and reduces its visual prominence where it does break the skyline.

There is a very high demand for mobile services in this area and as such is subject to the investment for an upgrade to provide enhanced provision from a single site. It has been demonstrated that the site has been chosen as the most suitable option, upgrading existing equipment on one single mast near to where the principle of development has already been accepted by the Council and has become part of the established landscape and is able to serve the surrounding area, including residents, businesses and visitors to this area.

The National Policy and the recent correspondence from Government ministers to local authorities clearly highlights the government's positive stance regarding telecommunications and broadband development whilst noting the substantial environmental and social benefits telecommunications can provide. We acknowledge that the authority accepts the importance of telecommunications infrastructure and the NPF guidance. The proposal upgrades telecommunication allowing more and better services to be provided from this tower. This is an important consideration in balancing the importance of the telecommunications infrastructure, against visual impact in line with local and national policy. Visual impact will be minimal, particularly when viewed in the context of what is currently in-situ at the site.

### **Summary**

Taking into consideration all the relevant factors set out above, it is considered that this proposal is the optimum solution in terms of enhanced provision from a single site for multiple operators, minimising any adverse impacts on local amenity. The maximum height of the proposed antennas at 30 metres is the absolute operational minimum to clear the immediate environment and provide coverage.

To summarise the case in favour of the proposal the following points are of relevance:

- With specific regard to telecommunications development, the proposal is fully compliant with National Policy the Code of Best Practise on Mobile Phone Development, and Local Policy.
- Site selection was progressed in accordance with advice in National Policy and the Code of Best Practice and represents the least environmentally intrusive, technically suitable, available option;
- The operator's site selection strategy is to keep the overall environmental impact to a minimum where

the operator will choose a site with the least impact upon the character of the area utilising an existing site;

- The site is submitted as a Full Planning, in line with the Town and Country Planning (General Permitted Development) (Scotland) (Amendment) Order 2022 which allows up to 30m high ground-based masts to be assessed using the Full Planning route.
- In this instance, this site is considered to have the least impact upon the character of the local area;
- The proposal fully accords with National and Local Policy and should, therefore, it is respectfully requested that it be approved.

#### Contact Details

---

<b>Name</b>	Thomas Clarkson MPlan	<b>Telephone</b>	0151 458 3343
<b>Signature</b>		<b>Email</b>	<a href="mailto:tom@entrust-services.com">tom@entrust-services.com</a>
<b>Position</b>	Member of the RTPI	<b>Company</b>	Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

---

<b>Name</b>	Neil Gates MRTPI	<b>Telephone</b>	0151 458 3343
<b>Signature</b>		<b>Email</b>	<a href="mailto:neil@entrust-services.com">neil@entrust-services.com</a>
<b>Position</b>	Chartered Member of the RTPI	<b>Company</b>	Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

---

<b>Address</b>	Entrust Unit 4 Century Building Tower Street Brunswick Business Park Liverpool L3 4BJ	<b>Operator</b>	Icon Tower Infrastructure Limited
----------------	--	-----------------	-----------------------------------

---

