

**SITE SUPPLEMENTARY INFORMATION**

1. Site Details

Site Name	Forfar West End Football Club	Site Address	FORFAR WEST END FOOTBALL CLUB, CRAIG O'LOCH ROAD, FORFAR, DD8 1BT
NGR	E: 345186, N: 750567		
Site Ref Number	GBR-ANS0001	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 network, which is proposed to be co-located pending positive determination.		
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why: The Industry databases were not used as the proposal is for an upgrade to local nearby cells which are able to be consolidated on to the new Icon Tower mast in due course.		

**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
N/A	

<sup>1</sup> Macro or micro

## Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Red	Amber	Green
Outline Consultation carried out:  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.			
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
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### 3. Proposed Development

The proposed site:

#### **About Icon Tower Infrastructure Ltd (Icon Tower)**

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.

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. 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**

The proposal is situated on the southern eastern corner of the Forfar West End FC football pitch. The surrounding area consists of mixed-use typologies: residential dwellings immediately to the south of the proposal, commercial/ industrial to the east, which is not of particularly high value amenity, whereas to the west it is predominantly rural as it opens up to parks and agricultural fields. The parks are unlikely to be impacted visually by the proposal as the golf course is lined by trees on its northern and western borders which will help screen the proposal.

The proposal is situated along the A926 road. There is a great quantity of vertical infrastructure situated along it such as streetlights and signage, along with the existing 1no. telecommunications mast. There are also many trees which add to the vertical emphasis in the area. It is considered that the proposal is situated in the most opportune area as there are other vertical elements present and the principle of development has therefore been established in the area. Additionally, the presence of other infrastructure such as car parks and industrial buildings confers low value amenity to the east of the proposal, from which the mast itself will be more visible.

**Proposed Development**

The installation of a new sharable 30m lattice mast which is collocated with an existing compound approximately 108m to the northwest of the site. The development includes 6no. antennas, 2no. 600mm dish, mounted to 1no. headframe, 6no. operator cabinets, 2no. operator electrical meter cabinets, 1no. multi-user electrical meter cabinet, 2.4m high steel palisade fence, and ancillary development thereto. This is required to facilitate enhanced network coverage for the Mobile Network Operators. This multi user structure with secure compound and upgraded power supply will enable a consolidation of equipment and in time lead to the removal of unused infrastructure from the wider site and cell area.

Type of Structure: Lattice

Height:	30m
Antenna	6no. and light grey in colour
Equipment Housing	9no. 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	2.4m high fencing fir green finish (alternative RAL colours can be sought on request of LPA)

**Reasons for choice of design:**

Code of Best Practice on Mobile Phone Network Development in Scotland (2022) states:

- *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.*

It is therefore deemed that this proposal follows the national guidance:

- The proposed mast is the lowest height in which the Operators can continue to provide the required level of coverage to the target area., It was decided that a lattice was best suited to this particular site as it assimilates itself within the rural environment, because the lattice structure allows to 'see through'.
- 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.

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>
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#### 5. Technical Justification

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

<p>Reason(s) why site required e.g. coverage, upgrade, capacity:</p> <p>The existing masts within the locality cannot support the necessary upgrades. To prevent the proliferation of masts Icon Tower has decided to co-locate the mast nearby an existing one. The proposal has the capability for upgrades and the ability to host new and antenna systems and preparing the site for future innovations in telecommunication equipment.</p>
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#### 6. Site Selection Process – alternative sites considered and not chosen.

<p>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.</p> <p>Improvements in telecommunications technology has led to the existing sites nearby becoming unsuitable for Icon Tower, as existing structures cannot support the required upgrades to the existing</p>
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telecommunications systems. 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 30m in height is required to ensure none of the existing operators lose coverage. The proposed height is also required to "see over" nearby trees and built form which are particularly problematic when broadcasting signal.

As the proposed development is intended to in time to replace existing telecommunication installations which are already established feature in the area, the applicant has kept the proposed new telecommunications mast at a point whereby a wide coverage area can be achieved by operators, while being located in an area where the principle of development has already been established due to the existing mast.

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

As referred to above, the applicant has taken a sequential approach. It is considered that developing a multi-user, sharable lattice tower on a site co-located with another mast is preferable to developing a new site, as this prevents the proliferation of masts in the area.

It should be noted that the proposed development is proposing to in time replace existing installations on existing masts which is in full accordance with the Code of Best Practice for Mobile Phone Network Development in England (2016).

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 Councils 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.

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- 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.

### **Local plan**

### **Angus Local Development Plan adopted September 2016**

#### **Policy TC13 Digital Connectivity & Telecommunications Infrastructure**

Proposals for telecommunications development will be permitted provided that the following criteria are met:

- The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;
- If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;
- If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the planning authority.
- If the proposed location is within a sensitive area or on a sensitive site or building, such as areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or listed buildings, it should be demonstrated that the development would not have any unacceptable effects.

When considering applications for telecommunications development, the planning authority will also have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

### **Application summary**

The development has been designed to be compliant with national and local policy.

The design and siting of the proposal seeks to minimise impact to the surrounding area as it will be co-located with another mast. This demonstrates that the principle of development has already been established in the area, along with the other vertical infrastructure.

Consideration has been given to the future demands of network development as the mast will be capable of carrying upgrades and will facilitate the provision of high-speed broadband in the area. Additionally, the proposed development has reduced the possibility of criminal damage such as vandalism by the erection of a 2.4m 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.

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. The 30m height is required in order to provide coverage to the required cell area, as the antennas need to be able to 'see over' the surrounding obstructions such as trees and buildings, to be able to provide maximum coverage.

Visual impact has also been reduced by the choice of colours and materials for this development, for example the galvanised finish helps the mast blend with the sky, and the lattice structure allows to 'see through' the structure and reduces its visual prominence where it does break the skyline. However, the applicant welcomes any suggestion of colour that the LPA deems most appropriate. Placing the proposed mast adjacent to trees is in accordance with the Code of Best Practice on Mobile Phone Network Development in England (2022).

There is a high demand for telecommunications in the area, and the proposed development will help facilitate that requirement.

The Local Policy has highlighted the need for proposals to be well designed and located in order to minimise impact to visual amenity, which is something this proposal aims to do. Whilst it is inevitable that the proposal will have some impact on the surroundings, the capability for upgrades and hosting multiple MNOs on the mast, will mean that in time, other masts in the area will become redundant as they become consolidated on to this proposal, along with avoiding the need for additional masts in the future.

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 NPPF 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 Practice on Mobile Phone Development, and Local Policy;
- It is in accordance with the UK Wireless Infrastructure Strategy which encourages the roll-out of 5G;
- 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 is considered preferable;
- The site is submitted as a Prior Notification, 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 Prior Notification 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

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**Company** Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

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**Position** Chartered Member of the RTPI

**Company** Entrust Professional Services Limited (on behalf of Icon Tower Infrastructure Limited)

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**Operator**

Icon Tower Infrastructure Limited

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