

SITE SPECIFIC SUPPLEMENTARY INFORMATION

1. Site Details

Site Name:	St Mary's Episcopal Church 204184	Site Address:	St Mary's Episcopal Church, 300 Great Western Road, Glasgow, G4 9JB
NGR:	E: 257758 N: 666809		
Site Ref Number:	22683	Site Type:	AC(Air Con) - Upgrade 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?		No
If no explain why: After a phone call to the LPA it was felt that the industry database was a more up to date source of information.		
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why: N/A		

Pre-application consultation with LPA

Date of written offer of pre-application consultation:	17 th January 2024
Was there pre-application contact:	No
Date of pre-application contact:	N/A
Name of contact:	The Director of Planning
Summary of outcome/Main issues raised: At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA.	

Ten Commitments Consultation

Rating of Site under Traffic Light Model:	Green		
Prior to the submission of this application the applicant initiate pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues.			
Summary of outcome/Main issues raised:			
No responses had been received at the time of submission.			

School/College

Location of site in relation to school/college:
There are no schools in close proximity to the site.
Outline of consultation carried out with school/college:
N/A
Summary of outcome/Main issues raised:
N/A

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?		Yes
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?		Yes
Details of response:		
N/A		

Site Provider Letter

Copy of Site Provider Letter enclosed?	Yes
Date served:	18 th January 2024

3. Proposed Development

The proposed site:
The current roof equipment at St Mary's Episcopal Church is being upgraded with limited impact but significant efficiency benefits. This upgrade is simply an AC upgrade which improves the efficiency of the existing telecoms equipment. There are no new antenna or other proposed telecoms works as part of this upgrade. The existing site and its surrounds can be seen below in Figures 1-3.

Figure 1:

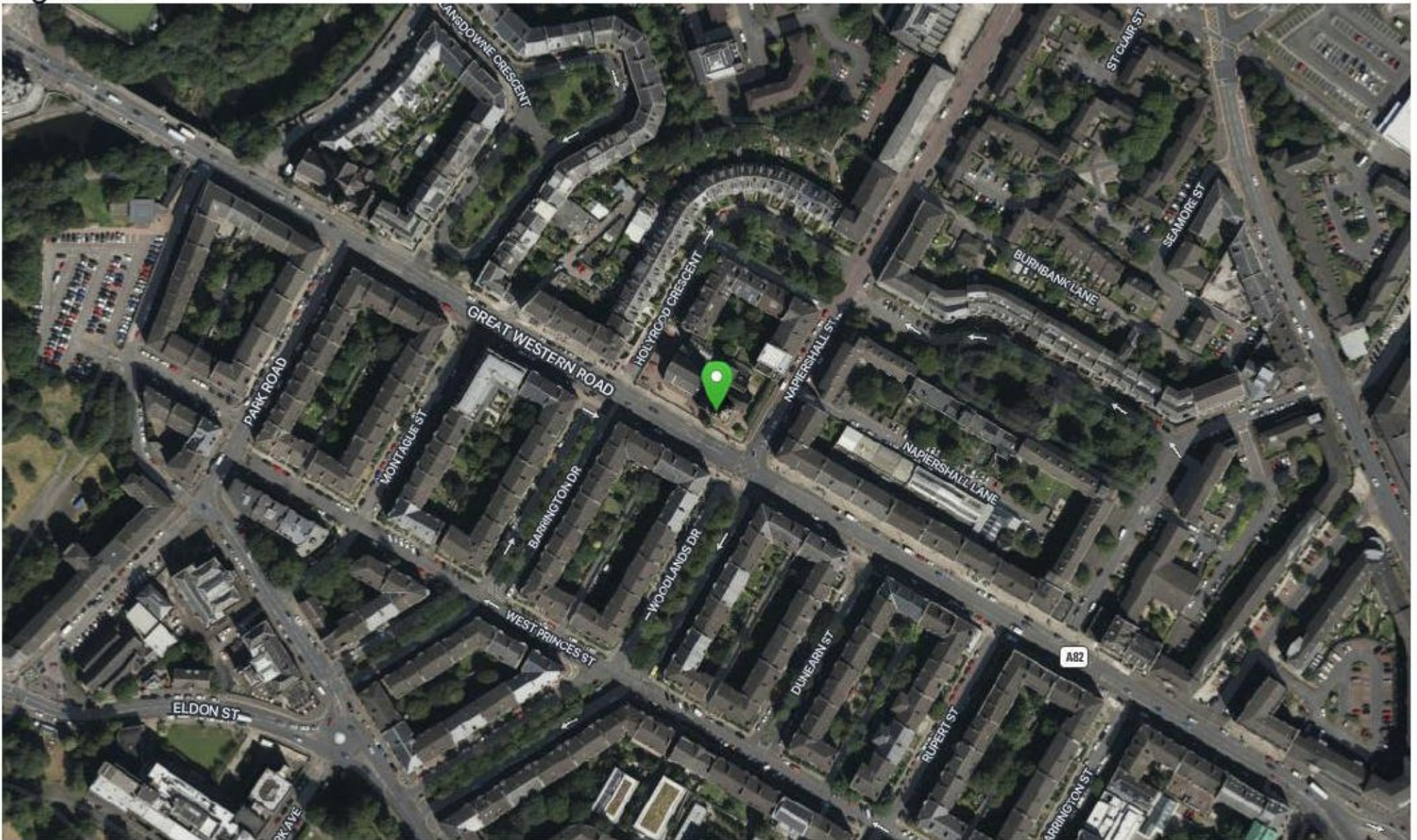


Figure 2:



Figure 3:



Central Government attaches great importance to the design of the built environment and outlines this within Section 12 (para. 124) of the National Planning Policy Framework. It states:

“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In keeping with the National Planning Policy Framework (NPPF). guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the street scene by integrating with the existing built environment.

The presence of the existing equipment sets a clear precedent for telecommunications development in this location and indicates that the principle of this proposal is acceptable in terms of siting. As stated above the National Planning Policy Framework advocates site sharing, and as such we believe that there are no sequentially preferable locations within the defined site search area.

The design of the proposed equipment is considered to be the least visually intrusive option available. Although it is accepted that there will be an intensification in the amount of equipment it is felt that such a minor increase would not detract from the character of the area in which the proposal sits.

Local Planning Authority: **Glasgow City Council**

Development Plan: **Glasgow City Development Plan (2017)**

Map Extract (Reference Only):



The site is designated as being within the settlement boundary, with urban uses to the north, east, south and west. The proposed upgrade is set on Category: A Listed Building and within Glasgow West Conservation Area. The site designation is a material consideration and the minor upgrade to seeks to both further enhance and preserve the existing landscape.

Glasgow City Council Supplementary Guidance (Interim) IPG3 Economic Development contains policy on telecoms. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with PAN62.

Policy Analysis:

Section 8 Telecommunications states:-

The Council will support proposals for new telecommunications infrastructure, where:

- i. they accord with Placemaking and Sustainable Spatial Strategy policy aims and objectives;
- ii. high-speed broadband is provided, especially where this is delivered via discrete underground cabling;
- iii. the site proposed has been identified and justified as the most appropriate solution following a search for alternative locations and options, including sharing or co-location of sites. Reasons for rejecting sites should be submitted as evidence;
- iv. visual impact is minimised through careful and sensitive design and siting;
- v. it is demonstrated that cumulative impact has been considered and limited;
- vi. careful landscaping or screening can be incorporated into the proposal, where appropriate.

Policy CDP9 reads:

"HISTORIC ENVIRONMENT

The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in line with Scottish Planning Policy, Historic Environment Scotland Policy Statement, and this policy together with associated supplementary guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses, in

this context, world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied."

This proposed development at the proposed site seeks to consolidate all existing elements into one location on site, minimised to ensure the scale and mass of the design is sympathetic to its surrounds, limiting visual impact on the wider character of the area and retaining the existing distance from sensitive receptors, yet retaining structural capacity to ensure that it would deliver the level of service needed in this location. As such it is considered the proposed development would accord with the principles of the Development Plan policy. The proposal fully accords with the requirements of PAN62.

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA on request

Type of Structure

Description:

PROPOSED 2No. EXTERNAL CONDENSER UNITS TO BE FLOOR MOUNTED ON ANTI-VIBRATION RUBBER FEET ON TOP OF EQUIPMENT CABIN ROOF WITHIN CHURCH TOWER.

PROPOSED 2NO. INTERNAL 7KW AIR CON EVAPORATOR UNITS TO BE WALL MOUNTED WITHIN CABIN (STACKED) EXISTING FAN UNIT TO BE REMOVED.

Overall Height: 57.4m AGL (Steeple Level)

Height of existing building	57.4m AGL
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Equipment Housing:

Length:	See Drawings
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Width:	See Drawings
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Height:	See Drawings
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Materials

Tower/mast etc – type of material and external colour:	See Drawings
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Equipment housing – type of material and external colour:	See Drawings
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Reasons for choice of design:

Central Government attaches great importance to the design of the built environment and outlines this within the National Policy Framework.

The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the Scottish Planning Policy which superseded NPPG 19. EE is the new operating company which used to be T Mobile and Orange.

In keeping with the NPF. guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the street scene.

4. Technical Information

<p>ICNIRP Declaration attached</p> <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>	<p>Yes</p>	
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<p>Frequency:</p>	<p>2G: GSM 900 MHz or GSM 1800 MHz Band, 3G: 2100 MHz band – UMTS</p>
<p>Modulation characteristics¹</p>	<p>GMSK for 2G Sites QPSK for 3G Sites</p>
<p>Power output (expressed in EIRP in dBW per carrier)</p> <p>In order to minimise interference within its own network and with other radio networks, (EE) operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision</p> <p>As part of (EE)’s network, the radio base station that is the subject of this application will be configured to operate in this way.</p>	<p>Maximum output of 32 dBW</p>
<p>Height of antenna (m above ground level)</p>	<p>32.83m AGL (Existing)</p>

5. Technical Justification

<p>Reason(s) why site required</p> <p>The National Planning Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.</p>
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¹ The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation
WHP Telecoms Ltd is a company registered in England and Wales (Company Registration Number 360 1208)
Registered Office: 401 Faraday Street, Birchwood Park, Warrington, WA3 6GA. VAT Registration 293349081.

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

Discounted Options

In accordance with the sequential approach outlined in the National Planning Framework (NPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

- a) Mast and Site Sharing
- b) Existing Buildings Structures
- c) Ground Bases Installations

In compliance with its licence and the sequential approach outlined in the NPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

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

N/A – This is a minor air con upgrade to an existing telecommunications site.

7. Additional Relevant Information

Background to the Proposal

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes, and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great unacceptable interference is created between the two cells.

NATIONAL PLANNING POLICY

The Fourth National Planning Framework (NPF4)

The NPF4 was adopted 13th February 2023. It details the Scottish Government's long term plan for what Scotland could be in 2045 and will influence planning decisions. The NPF4 encourages LDP's to support the delivery of digital infrastructure, including fixed line, and mobile connectivity, particularly in areas with gaps in connectivity and barrier to digital access. Policy 24 reads "Development proposals that incorporate appropriate, universal, and future-proofed digital infrastructure will be supported"

Part 1– sets out an overarching spatial strategy for Scotland in the future. This includes priorities, spatial principles and action areas. This should be used to guide the preparation of regional spatial strategies, local development plans and local place plans. The strategy is relevant to wider policies and strategies relating to land use.

Part 1 of the Plan sets out aspirations to stimulate green prosperity, stating that natural assets and environmental quality underpin the area's main economic sectors and must therefore be protected, restored and used sustainably. A flexible approach to planning will help to attract investment, grow and diversify businesses and enable local entrepreneurship, micro enterprises, self-employment and social enterprises to flourish. Remote working can be capitalised on to build economically active local communities. The Plan acknowledges that achieving these aspirations will require the continued roll out of high-quality digital infrastructure and maintenance and decarbonisation of transport routes to wider markets.

Part 2– sets out proposed national developments that support the spatial strategy.

Part 3– sets out policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part should be taken as a whole, and all relevant policies should be applied to each application.

Part 3 is a 'Planning Policy Handbook' and covers the following themes:

- Sustainable Places (Universal policies)
- Liveable Places
- Productive Places
- Distinctive Places

In respect of 'Digital infrastructure', NPF4 states 'We want our all of our places to be digitally connected. Digital connectivity has a central role to play in unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and population growth. This will play an increasingly important role in supporting essential services including healthcare and education. We want to ensure that no areas are left behind by closing the digital divide. The planning system should continue to support the roll-out of digital infrastructure across all of Scotland, ensuring that policies recognise the importance of future-proofing infrastructure provision whilst addressing impacts on local communities and the environment'.

Policy 23 relates to 'Digital Infrastructure' and states:

- a) Local development plans should support the delivery of digital infrastructure, particularly in areas with gaps in connectivity and barriers to digital access.
- b) Development proposals should incorporate appropriate, universal and futureproofed digital infrastructure. This should be done in consultation with service providers.
- c) Development proposals that deliver new digital services or provide technological improvements, particularly in areas with no or low connectivity capacity, should be supported. Planning authorities should not question the need for the service to be provided where proposals are clearly aligned with fulfilling the delivery of local or national policy objectives which support the roll-out of digital infrastructure in areas with no or low connectivity where there are benefits of this connectivity for communities and the local economy.
- d) Development proposals for telecommunications development should be supported where:
 - the visual and amenity impact of the proposed development has been minimised through careful siting, design and where appropriate landscaping;

- it has been demonstrated that all practicable options and alternative sites have been considered, including the possibility of using existing masts, structures and buildings and/or site sharing;
- there is no physical obstruction to aerodrome operations, technical sites or existing transmitter/receiver facilities.

e) Development proposals that are likely to have an adverse effect on the operation of existing digital infrastructure or on the delivery of strategic roll-out plans should not be supported unless appropriate mitigation measures can be provided.

Forging Our Digital Future With 5G: A Strategy For Scotland (2019)

The Foreword notes that the technological revolution will be a significant opportunity for Scotland over the coming years. The rollout of 4G and 5G is the next wave and will potentially see huge social, economic and environmental benefits to the whole country. While the UK's mobile network operators are already investing large sums in rolling out 4G and 5G, we must act collectively to ensure that all of Scotland – including rural areas – benefits from this revolution. The prize is a boost to our nation's fortunes, creating better, healthier and happier lives for everyone.

The Scottish Government's aspiration is for Scotland to be at the forefront of this revolution and, ultimately, to establish the whole country as a leading 5G digital nation.

It is estimated that with 5G capability, Scotland has the potential to add £17 billion to GDP by 2035, create 160,000 new jobs and increase productivity by £1,600 per worker. 5G could play a part in creating 3,100 new businesses and a £3.3 billion growth in export volumes.

Significantly, 4G and 5G also has the potential to help sustain remote and rural areas, allowing all of Scotland's citizens and communities to embrace the technology and reap its benefits.

To make this happen, the Scottish Government is working with a range of organisations and interested parties to ensure the swift national deployment of 4G and 5G.

The Scottish Government has an aspiration for Scotland to be among the global leaders in IOT and the adoption of sensor technologies, which will help drive economic growth, transform public services and give citizens better and healthier lives.

Scottish Planning Policy: Advanced, high quality electronic communications infrastructure is an essential component of economic growth across Scotland. It also has a role in reducing the need to travel, particularly the need for commuting and other business travel by enabling alternative working patterns, therefore contributing to reduce emissions. Planning authorities should support the expansion of the electronic communications network, including telecommunications, broadband and digital infrastructure, through the development plan and development management decisions, taking into account the economic and social implications of not having full coverage or capacity in an area. The Government's objective is to ensure that everyone can enjoy the same degree of access to high quality electronic communication opportunities. This should be achieved in a way that keeps the environmental impact of communications infrastructure to a minimum. (para 248).

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 IV27 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.*

Fixing the Foundations: Creating a more prosperous nation (July 2015)

This document known as the 'Productivity Plan' sets out a 15-point plan that the government will put into action to boost the UK's productivity growth, centered around two key pillars: encouraging long-term investment, and promoting a dynamic economy. It sets out the government's long-term strategy for tackling the issues that matter most for productivity growth.

Chapter 7 of the Productivity Plan refers to 'World-class digital infrastructure in every part of the UK'.

The Plan states a 'Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support flexible working and working from home. Investment in high speed broadband will support long-term economic growth, with GVA increasing by £6.3 billion, causing a net increase of 20,000 jobs in the UK by 2024.1 Geographic coverage and take-up of superfast broadband in the UK is already the highest of the 5 largest EU economies.2 The government's superfast broadband programme is passing an additional 40,000 premises every week – superfast speeds of at least 24Mbps will be available to 95% of UK households by 2017'.

By reducing regulatory red tape and barriers to investment, the government has committed to support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage.

Recognising the vital importance of mobile connectivity for residents and local economies, the urgent delivery of the required network improvements continues to be a Government priority. This commitment has now been fully endorsed with amendments under Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) which came in to force on 24th November 2016. These amendments removed certain planning restrictions for the deployment of the necessary infrastructure so that everyone has access to the information super highway, no matter where they are located.

Conclusion

We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Framework and Local Plan Policies.

Ryan Marshall
Planning Manager
Email: r.marshall@whptelecoms.com

Contact Details

Name: (Agent)	Ryan Marshall	Telephone:	Emailed upon request
Operator:	EE Ltd & H3G UK Ltd	Fax no:	N/A
Address:	WHP Unit 1A Station Court Station Road Guiseley Leeds LS20 8EY	Email Address:	[REDACTED]
Signed:	[REDACTED]	Date:	22 nd January 2024
Position:	Planning Manager	Company:	WHP
		(on behalf of above operator)	