



Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: [planning.support@edinburgh.gov.uk](mailto:planning.support@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100566857-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

### Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent

### Agent Details

Please enter Agent details

Company/Organisation:	<input type="text" value="Dot Surveying Ltd"/>		
Ref. Number:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
First Name: *	<input type="text" value="Hannah"/>	Building Name:	<input type="text" value="The Bonds"/>
Last Name: *	<input type="text" value="Gibson"/>	Building Number:	<input type="text"/>
Telephone Number: *	<input type="text" value="07494751391"/>	Address 1 (Street): *	<input type="text" value="2 Anderson Place"/>
Extension Number:	<input type="text"/>	Address 2:	<input type="text"/>
Mobile Number:	<input type="text"/>	Town/City: *	<input type="text" value="Edinburgh"/>
Fax Number:	<input type="text"/>	Country: *	<input type="text" value="United Kingdom"/>
		Postcode: *	<input type="text" value="EH6 5NP"/>
Email Address: *	<input type="text" value="h.gibson@dotsurveying.co.uk"/>		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text" value="Star House"/>
First Name: *	<input type="text"/>	Building Number:	<input type="text"/>
Last Name: *	<input type="text"/>	Address 1 (Street): *	<input type="text" value="20 Grenfell Road"/>
Company/Organisation	<input type="text" value="CK Hutchison Networks (UK) Ltd"/>	Address 2:	<input type="text" value="Maidenhead"/>
Telephone Number: *	<input type="text" value="07494751391"/>	Town/City: *	<input type="text" value="Reading"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="Maidenhead"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="SL6 1EH"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="h.gibson@dotsurveying.co.uk"/>		

## Site Address Details

Planning Authority:	<input type="text" value="City of Edinburgh Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text"/>
Address 2:	<input type="text"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text"/>
Post Code:	<input type="text"/>

Please identify/describe the location of the site or sites

<input type="text" value="West Harbour Road, Granton, Edinburgh, EH5 1HE"/>
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Northing	<input type="text" value="677153"/>	Easting	<input type="text" value="323683"/>
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## Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: \*  
(Max 500 characters)

In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

## Type of Application

What type of application did you submit to the planning authority? \*

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? \*

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

## Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: \* (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

In refusing the application, it is our opinion the local planning authority has not fully considered the significant efforts made by the Appellant to ensure the subject site and proposed design strikes an appropriate balance between operational requirements, and the significant improvements enhanced 5G will bring, along with the environmental considerations of all relevant National and Local Planning Policy.

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? \*

Yes  No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: \* (Max 500 characters)

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: \* (Max 500 characters)

Pre-application correspondence, Site detail sheet, Drawings. Site Specific Supplementary Information (SSSI) 'Planning Statement', ICNIRP Declaration.

## Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

21/06399/FUL

What date was the application submitted to the planning authority? \*

29/11/2021

What date was the decision issued by the planning authority? \*

24/02/2022

## Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. \*

Yes  No

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? \*

Yes  No

Is it possible for the site to be accessed safely and without barriers to entry? \*

Yes  No

## Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. \*

Yes  No

Have you provided the date and reference number of the application which is the subject of this review? \*

Yes  No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? \*

Yes  No  N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? \*

Yes  No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review \*

Yes  No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

## **Declare – Notice of Review**

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Ms Hannah Gibson

Declaration Date: 19/05/2022

## Mobile UK Briefing Note: 5G and Health

### What is 5G?

5G is short for 'fifth-generation mobile networks.' It is a truly transformational technology that will provide the underlying wireless infrastructure to support a host of new applications such as connected cars, virtual and augmented reality and the foundations for emerging smart city and Internet of Things (IoT) technologies.

### What are the features of 5G?

- **Faster download speeds:** 5G will provide much faster speeds than are achievable with today's 4G networks. 5G is expected to provide speeds between 1GBps and 10GBps. This would mean a full HD movie could be downloaded in 10 seconds as opposed to 10 minutes today.
- **Lower Latency:** 5G will also have significantly lower latency meaning very little lag (or buffering). This will enable applications that aren't possible today on mobile, such as multiplayer gaming, factory automation, and other tasks that demand quick responses.
- **Greater Capacity:** 5G will also have vastly greater capacity so that networks can better cope with not only the rapidly increasing data demands of customers today but the growth of high-demand applications being planned in the future.

### Are 5G and mobile signals-safe?

Exposure guidelines govern mobile signals in the UK, and the consensus of reviews by independent public health authorities, including Public Health England, expert groups and the World Health Organization (WHO) is that these guidelines provide protection for all people (including children) against all established health hazards.

## Exposure Limits and Guidelines

### UK and international guidelines for exposure limits

The exposure guidelines in the UK have been developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), following a comprehensive assessment of all the peer-reviewed scientific literature, including thermal and non-thermal effects. The guidelines are based on evaluations of biological effects that have been established to have health consequences. The WHO recommends that countries adopt the ICNIRP guidelines.

### Do current guidelines cover 5G?

Yes, current UK and international guidelines cover all frequencies used for mobile telephony, including those allocated to 5G.

The ICNIRP exposure guidelines for frequencies up to 300 GHz, published in 1998, are being revised and replaced and are expected to be published this year. It remains the opinion of ICNIRP, and other bodies such as the WHO, that there is no convincing evidence of adverse health effects at exposure below the guideline levels.

Ofcom recently (February 2020) extended its programme measuring EMF emissions from equipment used to transmit mobile signals and other wireless services to cover the frequencies being used for 5G. It measured 16 5G sites in towns and cities across the UK, focusing on areas where mobile use is likely to be highest. At every site, emissions were a small fraction of the levels included in international guidelines, as set by ICNIRP. And the maximum measured at any site was 1.5% of those levels.

### What kind of research exists on the possible health risks from exposure to 5G?

Information on new research and details of individual studies can be found in the EMF-Portal web database maintained by the RWTH Aachen University, Germany: <https://www.emf-portal.org/en>

The radio signal exposure characteristics of 5G are similar to those of existing mobile technologies. In particular, the new applications use similar transmitting powers and operate in similar frequency ranges. A European Commission expert committee concluded that current knowledge about how EMF interacts with the human body can be used to set exposure limits for the whole frequency range up to 300 GHz. Therefore, existing health risk assessments are valid independently of the wireless technology for the whole frequency range.

### Are RF signals a possible human carcinogen, and what does that mean?

In May 2011 a working group of the International Agency for Research on Cancer (IARC) classified RF electromagnetic fields as possibly carcinogenic to humans (Group 2B). The WHO explains that this is a category used when a causal association is

considered credible, but when chance, bias or confounding cannot be ruled out with reasonable confidence.

It is important to note that following the classification, the WHO has not recommended any changes to the exposure limits applicable to wireless networks and devices.

## What is the advice from Public Health England?

Public Health England's main advice, updated in May 2019, about radio waves from base stations is that:

*"The guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) should be adopted for limiting exposures. After reviewing the evidence, ICNIRP set guidelines to avoid excessive heating of the body and established the impact of exposure which can have detrimental effects. The ICNIRP guidelines apply to frequencies up to 300 GHz and cover exposures arising from new 5G base stations as well as from older technologies."*<sup>1</sup>

## What is the advice from the WHO on the mobile devices we use and health?

The position of the WHO regarding health effects from mobile phones is that:

*"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use."*

## Are children at greater risk?

There have been many independent scientific reviews, and these have consistently concluded that the international guidelines are protective of all persons, including children.

*"Although a substantial amount of research has been conducted in this area, there is no convincing evidence that RF field exposure below guideline levels causes effects in adults or children."* (United Kingdom Health Protection Agency (2012)).<sup>2</sup>

## 5G Networks

### 5G is broadcast at a higher frequency, so does that mean higher exposure?

No, higher frequency does not mean higher exposure. Higher frequencies generally mean shorter ranges, lower power and, due to the increase of the available bandwidth, provides for the possibility of higher data rates. Current and future deployment will use frequencies already covered by existing exposure standards.

### Does higher data rates mean higher network exposure?

One of the goals of 5G deployments is to provide much higher data rates. This is needed to meet the high expectations and demands customers place on mobile communication applications and services both in their professional and private life. Based on the results from current 5G test networks, it is expected that the maximum exposure levels in areas around base stations will be similar to existing mobile services that use similar transmitter powers.

With the introduction of new technologies, there may be a small increase in the overall radio signal exposure level since new transmitters are active. Based on the transition from previous wireless technologies, we can expect that the overall exposure levels will remain relatively constant and well within the international exposure guidelines.

### Will 5G replace earlier mobile network technologies?

Early 5G deployments will be in locations where it is needed to supplement the capacity of current networks. Further rollouts will occur as demand dictates. It is expected that 5G will work alongside other technologies, i.e. 2G, 3G and 4G, to provide a continuity of service for customers who can continue to use their devices on existing networks.

### Does 5G mean an antenna on every street corner and inside all buildings?

Wherever possible, an operator will place these antennas at an existing site, potentially replacing one of the existing antennas on the site. Only where additional capacity and/or coverage is needed will additional sites be built.

## Contact Details

For further information, please contact Mobile UK on [info@mobileuk.org](mailto:info@mobileuk.org)

<sup>1</sup> Public Health England, 2019

<sup>2</sup> Health Effects from Radiofrequency Electromagnetic Fields – RCE 20, Advisory Group on Non-ionising Radiation (AGNIR), Health Protection Agency, April 2012



## **Appendix 1 – Pre-Application Consultation**

### **Copy of pre-consultation correspondence with Edinburgh City Council for EDC16648 telecoms installation on a footpath on West Harbour Road**

#### **Pre-consultation with Local Planning Authority**

- **Site Detail Sheet**





**G5 ROLL OUT PLANNING PRE-APPLICATION ENQUIRY - SITE DETAIL SHEET**

**Site Requirement**

Site Introduction	Telecoms Planning Pre-Application Enquiry for a proposed telecommunications installation at:
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**WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Site Objective	To provide the surrounding area with mobile coverage, while linking other sites into the wider Network. The site is part of a project to supply the surrounding area with 5G coverage. At present, there is a gap in network coverage within this particular area.
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**Preferred Site**

Site Name	<b>EDC16648 – WEST HARBOUR ROAD SW</b>
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National Grid Reference	NGR E 323683 N 677153
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Traffic Light Model Rating	Amber
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Assessment	In this instance, a new 20m high ‘slim line’ Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.
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The equipment has been designed to create a minimal, modern telecoms installation, which is required to extend high-speed mobile coverage to the area in and around the area.

**Equipment Details: -**

Please refer to the planning drawings (enclosed) -  
EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

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**Figure 1** – Plot showing the required area to be covered, with a blue tab showing the preferred location from a coverage perspective.



**Figure 2** – An illustration of the intended search area, which has a 100-metre radius. The proposed site location is situated near the outer 300m search area.



**Figure 3 - Site Photograph:** (approximate location of site)



**Proximity of the site to schools?**

The proposed location is not within 400m of an education centre.

## Proximity to airports?

Proposed location is not within 3km of an airport or aerodrome.

Other airports without scheduled flights sorted by distance.

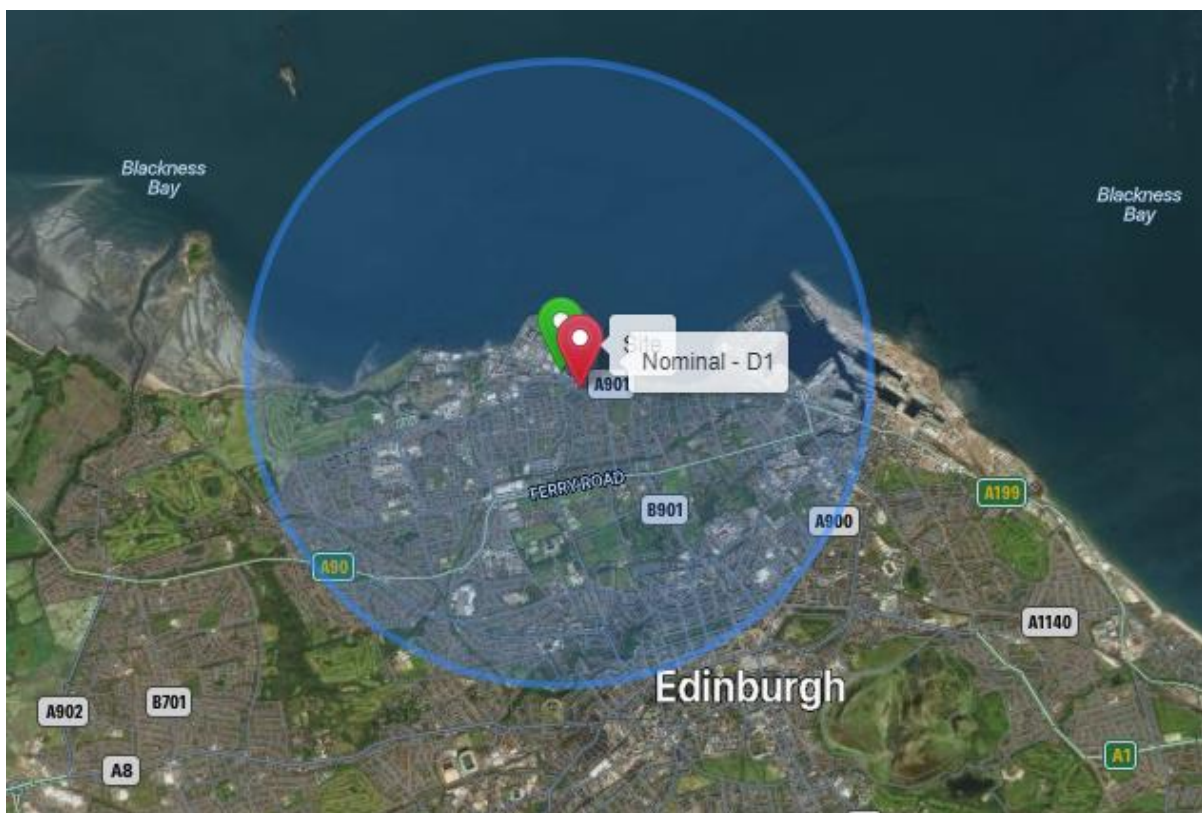
Type	Airport Name	City	IATA Code	Connectivity	Distance
X	RAF Leuchars	St. Andrews	ADX	★★★★★	30.31 mi
X	[Duplicate] Pic	Prestwick		★★★★★	62.32 mi

### 🇬🇧 Airport Near EH5 1HX, UK

[<< Go Back To UK Nearest Airport Search](#)

Airports with scheduled flights sorted by distance.

Type	Airport Name	City	IATA Code	Connectivity	Distance
X	Edinburgh Airport	Edinburgh	EDI	★★★★★	6.09 mi
X	Dundee Airport	Dundee	DND	★★★★★	33.42 mi



## Is the site within or close to a Conservation Area?

The proposed location does not appear to be in a conservation. Although our proposed site is not situated within an area that possess specified designations; we are still aware of the importance of specified designations upon the Granton area. We believe that we have taken the necessary care and attention to the surrounding area in the sitting and appearance of this mast and believe that no adverse impacts would be felt in this area. The proposed site is positioned on a pavement and the trees to provide screening. Please note that the mast and cabinets are to be coloured grey, to further add the assimilation of the mast to the area, however the mast can be painted to the specification of City of Edinburgh Council.

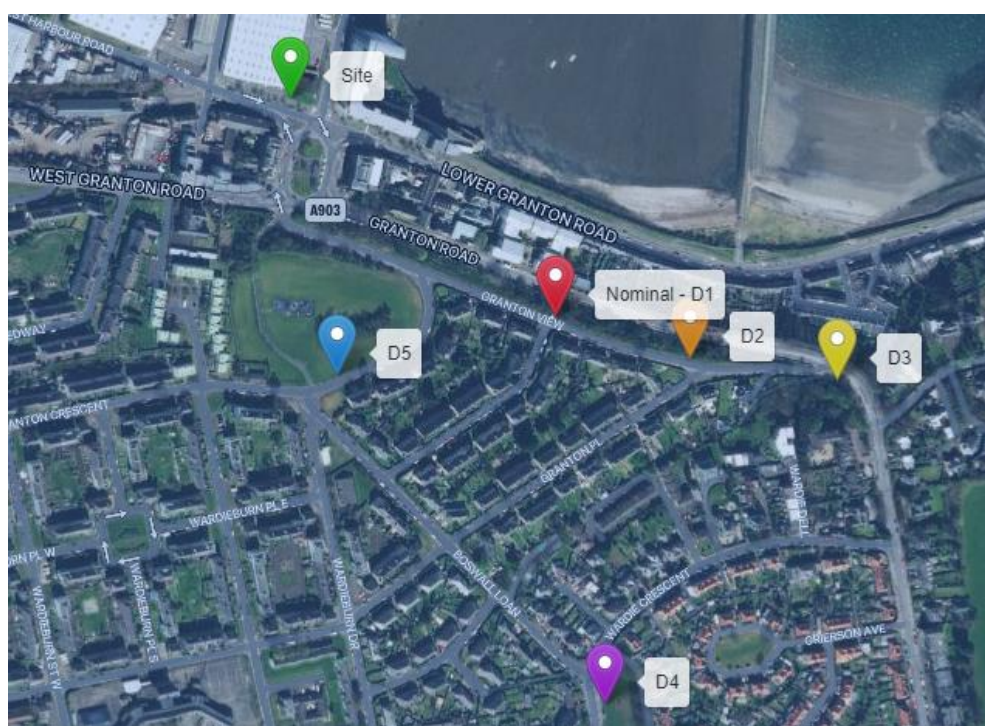
## Site description of Designated Search Area (DSA).

As this mast is a 5G installation, to work it needs to be close to those who will benefit from the technology, therefore a small search area is required. Movements outside this area are likely to require a proliferation of masts to do the same job, and even then, coverage gaps are likely.

The DSA located near a substation in a residential area of Granton, Nominal location pavement was not wide enough for installation. The density of residential property and the width of pavements not being suitable for any telecom's installation within the DSA.

**Discounted Sites:** List of other sites investigated within a 100m Search Area and why they have been discounted – area in general is a densely populated area with small streets and residential housing. Pavements are broken up for parking.

Site	NGR	Discounted Reason
D1 – Granton View	323909 , 676961	Discounted option due to pavement width restrictions, proximity to residential housing and an electrical substation.
D2 – Granton View	324025 , 676922	Discounted option due to pavement width restrictions and proximity to residential housing.
D3 – Granton Road	324152 , 676901	Discounted option due to pavement width restrictions and visibility splay concerns.
D4 – Grierson Road	323946 , 676626	Discounted option due to pavement width restrictions and proximity to residential housing.
D5 – Granton Crescent	323719 , 676913	Discounted option due to pavement width restrictions and proximity to residential housing.



## Legislation

Extracts have been taken from the Edinburgh City Council Website.  
Highlighting the importance of up-to-date telecommunications/Connectivity.

### 5) Resources and Services

- 90 The LDP has a role in supporting development which meets needs vital to modern life. These include the use of natural resources such as energy and materials, and the provision of network services such as water supply, drainage and telecommunications.

#### Telecommunications

#### Policy RS 7 Telecommunications

Planning permission will be granted for telecommunications development provided:

- a) the visual impact of the proposed development has been minimised through careful siting, design and, where appropriate, landscaping
- b) 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
- c) the proposal would not harm the built or natural heritage of the city.

306 The provision of new telecommunications infrastructure is essential to economic competitiveness. The telecommunications industry must be enabled to expand and diversify, but this must be undertaken sensitively and imaginatively, and with minimum environmental impact. Telecommunications equipment such as antennas, mobile phone masts and base stations can have a significant visual impact in both urban and rural areas. Telecommunications operators are therefore required to demonstrate that all practicable options to minimise impact have been explored, and the best solution identified.

307 There will be a limited number of locations, including city landmarks such as Arthur's Seat and Salisbury Crag, where the impact of an installation cannot be satisfactorily minimised, and where it will therefore be unacceptable in principle. In other locations, individual proposals may be acceptable but where there is a concentration of these uses, consideration will be given to the cumulative visual impact. Conditions will be imposed on any consent, requiring the removal of any mast or apparatus and the reinstatement of a site to its former condition when it becomes redundant.

308 Edinburgh is one of ten UK cities to receive early delivery of high speed broadband and large areas of wireless connectivity in public areas. The latter will require installation of new equipment, some of which may require planning permission or conservation area / listed building consent. These will be assessed using the above policy if appropriate and a separate non-statutory guideline on telecommunications.



**Appendix 2 – EDC16648 Copy of the GPDO Application  
for Prior Approval Submission for 20m monopole  
(dated 6 December 2021)**

**Please see Planning Pack for application as downloaded  
from the planning portal for application reference  
21/06399/FUL**

- Application form
- Site Specific Supplementary Information (SSSI)
- ICNIRP Declaration
- Drawings
- Developer's Notice (Owner Notification)
- Associated Information

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: [planning.support@edinburgh.gov.uk](mailto:planning.support@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE      100508847-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

Is this a temporary permission? \*

Yes  No

If a change of use is to be included in the proposal has it already taken place?  
(Answer 'No' if there is no change of use.) \*

Yes  No

Has the work already been started and/or completed? \*

No  Yes – Started  Yes - Completed

## Applicant or Agent Details

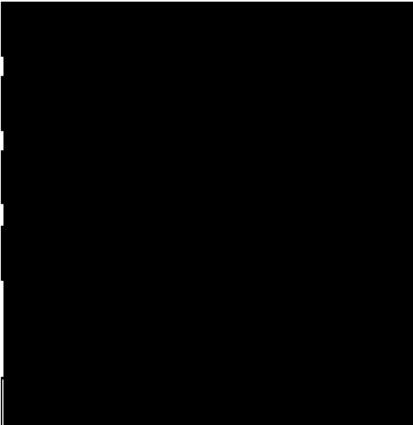
Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent



## Agent Details

Please enter Agent details

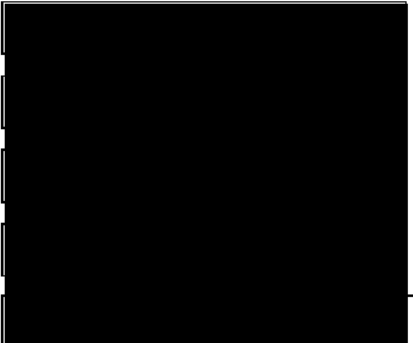
Company/Organisation:	Dot Surveying Ltd		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Tom	Building Name:	
Last Name: *	Gallivan	Building Number:	14
Telephone Number: *		Address 1 (Street): *	Inverleith Place
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Edinburgh
Fax Number:		Country: *	United Kingdom
Email Address: *		Postcode: *	EH3 5PZ

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	Great Bingham Mead
First Name: *		Building Number:	
Last Name: *		Address 1 (Street): *	Great Bingham Mead
Company/Organisation	CK Hutchison Networks (UK) Ltd	Address 2:	Great Bingham Mead, Vastern Road
Telephone Number: *		Town/City: *	Reading
Extension Number:		Country: *	United Kingdom
Mobile Number:		Postcode: *	RG1 8DJ
Fax Number:			
Email Address: *			

## Site Address Details

Planning Authority:

City of Edinburgh Council

Full postal address of the site (including postcode where available):

Address 1:

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

Post Code:

Please identify/describe the location of the site or sites

WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE

Northing

677153

Easting

323683

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

Yes  No

## Pre-Application Discussion Details Cont.

In what format was the feedback given? \*

Meeting  Telephone  Letter  Email

Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) \* (max 500 characters)

none noted

Title:

Other

Other title:

Edinburgh City Council

First Name:

Last Name:

Correspondence Reference  
Number:

Date (dd/mm/yyyy):

20/11/2021

Note 1. A Processing agreement involves setting out the key stages involved in determining a planning application, identifying what information is required and from whom and setting timescales for the delivery of various stages of the process.

## Site Area

Please state the site area:

10.00

Please state the measurement type used:

Hectares (ha)  Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

pavement

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

Yes  No

If Yes please describe and show on your drawings the position of any existing, altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? \*

Yes  No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

0

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? \*

0

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

## Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? \*

Yes  No

Do your proposals make provision for sustainable drainage of surface water?? \* (e.g. SUDS arrangements) \*

Yes  No

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? \*

- Yes  
 No, using a private water supply  
 No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

Yes  No  Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

Yes  No  Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

Yes  No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? \*

Yes  No

If Yes or No, please provide further details: \* (Max 500 characters)

n/a

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

Yes  No

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

Yes  No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013? \*

Yes  No  Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

Yes  No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*  Yes  No

Is any of the land part of an agricultural holding? \*  Yes  No

Are you able to identify and give appropriate notice to ALL the other owners? \*  Yes  No

If you cannot trace all the other owners, can you give the appropriate notice to one or more owner? \*  Yes  No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate C

## Certificates

The certificate you have selected requires you to distribute copies of the Notice 1 document below to all of the Owners/Agricultural tenants that you provided previously. Please note that your planning authority may be required to place an advertisement in a local newspaper. You may wish to contact the planning authority for further guidance.

Notice 1 is required

I understand my obligations to provide the above notice before I can complete the certificates. \*

# Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that – (1) –

I am/The applicant is unable to issue a certificate in accordance with Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and in respect of the accompanying application;

(2) - No person other than myself/the applicant was an owner of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

or –

(3) - I have/the applicant has been unable to serve notice on any person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application relates.

or –

(2) - I have/The applicant has served notice on each of the following persons other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application/appeal was owner [Note 2] of any part of the land to which the application relates.

Name:

Address:

Date of Service of Notice: \*

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;

or –

(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:

Name:

Address:

Date of Service of Notice: \*

(4) – I have/The applicant has taken reasonable steps, as listed below, to ascertain the names and addresses of the other owners or agricultural tenants and \*have/has been unable to do so –

Tile search and adoption checks were undertaken

Signed: Tom Gallivan

On behalf of: CK Hutchison Networks (UK) Ltd

Date: 01/12/2021

Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

Yes  No  Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

Yes  No  Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

Yes  No  Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

Yes  No  Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- Site Layout Plan or Block plan.
- Elevations.
- Floor plans.
- Cross sections.
- Roof plan.
- Master Plan/Framework Plan.
- Landscape plan.
- Photographs and/or photomontages.
- Other.

If Other, please specify: \* (Max 500 characters)

Provide copies of the following documents if applicable:

- |  |  |
|--|--|
| A copy of an Environmental Statement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Design Statement or Design and Access Statement. *                                   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Flood Risk Assessment. *   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). * | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Drainage/SUDS layout. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Transport Assessment or Travel Plan  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Contaminated Land Assessment. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Habitat Survey. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Processing Agreement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |

Other Statements (please specify). (Max 500 characters)

## Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Tom Gallivan

Declaration Date: 03/12/2021

## Payment Details

Online payment: ~~0000-0000-0000-0000-0000-0000~~

Payment date: 03/12/2021 15:43:00

-

Created: 03/12/2021 15:43



**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION  
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	WEST HARBOUR ROADstreet works	Site Address:	WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE
NGR:	E: 323683 N: 677153		
Site Ref Number:	EDC16648	Site Type:	In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

2. Pre-Application Check List

**Site Selection**

Was the Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:		
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 the Local Planning Authority**

Written offer of pre-application consultation:	N/a	
Was there pre-application contact:		Yes
Date of pre-application contact:	20 <sup>th</sup> November 2021	
Name of contact:	Email issue to the Local Planning Department.	

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

**Ten Commitments Consultation**

Rating of Site under Traffic Light Model:	Amber
Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss development proposals and identify site specific issues.	

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, as well as the objectives of the National Planning Policy Framework (February 2019).

It is our opinion that the proposed design presents a better ‘fit’ within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway identified, as situated out with a conservation area or other such restrictive designation.

It is considered that the design and siting, accords with Local Authority’s critical role in delivering the UK Government’s Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27<sup>th</sup> August 2020.

**School/College**

Location of site in relation to school/college:
There are no schools within 400m of the proposed location.

Outline of consultation carried out with school/college:
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N/A.
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?		No
Has the Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator been notified?  N/A		No
Details of response:  N/A		

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	
Date served:	1 <sup>st</sup> December 2021	

**3. Proposed Development**

<p>The proposed site:</p> <p>CK Hutchison Networks (UK) are in the process of supporting the UK Government's Digital connectivity objective and providing a critical role in building the UK's fastest mobile network to provide improved coverage and capacity, most notably in relation to 5G services.</p> <p>The technical details of this proposal are illustrated within application design drawings as attached.</p> <p>The very nature of installing new 5G mast infrastructure within such an urban setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective 'in-fill' mast sites are extremely limited.</p> <p>There is an acute need for a new base station to provide effective service coverage and in this case, the height of the proposed street pole is the minimum required to bring the benefits of 5G to this area.</p> <p><b>Figure 1 - Site Photograph's</b></p>
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Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental.

The proposed site option is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the minimum height which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is located in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis:

**Planning Policy Relevant to the Development Site:**

Development Plan Policy: National Planning Policy Framework (February 2019)

The relevant Local Plan against which the application will be determined, is

Extracts have been taken from the Edinburgh City Council Website. Highlighting the importance of up-to-date telecommunications/Connectivity.

## 5) Resources and Services

- 90 The LDP has a role in supporting development which meets needs vital to modern life. These include the use of natural resources such as energy and materials, and the provision of network services such as water supply, drainage and telecommunications.

### Telecommunications

#### Policy RS 7 Telecommunications

Planning permission will be granted for telecommunications development provided:

- a) the visual impact of the proposed development has been minimised through careful siting, design and, where appropriate, landscaping
- b) 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
- c) the proposal would not harm the built or natural heritage of the city.

306 The provision of new telecommunications infrastructure is essential to economic competitiveness. The telecommunications industry must be enabled to expand and diversify, but this must be undertaken sensitively and imaginatively, and with minimum environmental impact. Telecommunications equipment such as antennas, mobile phone masts and base stations can have a significant visual impact in both urban and rural areas. Telecommunications operators are therefore required to demonstrate that all practicable options to minimise impact have been explored, and the best solution identified.

307 There will be a limited number of locations, including city landmarks such as Arthur's Seat and Salisbury Crags, where the impact of an installation cannot be satisfactorily minimised, and where it will therefore be unacceptable in principle. In other locations, individual proposals may be acceptable but where there is a concentration of these uses, consideration will be given to the cumulative visual impact. Conditions will be imposed on any consent, requiring the removal of any mast or apparatus and the reinstatement of a site to its former condition when it becomes redundant.

308 Edinburgh is one of ten UK cities to receive early delivery of high speed broadband and large areas of wireless connectivity in public areas. The latter will require installation of new equipment, some of which may require planning permission or conservation area / listed building consent. These will be assessed using the above policy if appropriate and a separate non-statutory guideline on telecommunications.

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

**Policy Analysis:**

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.”*

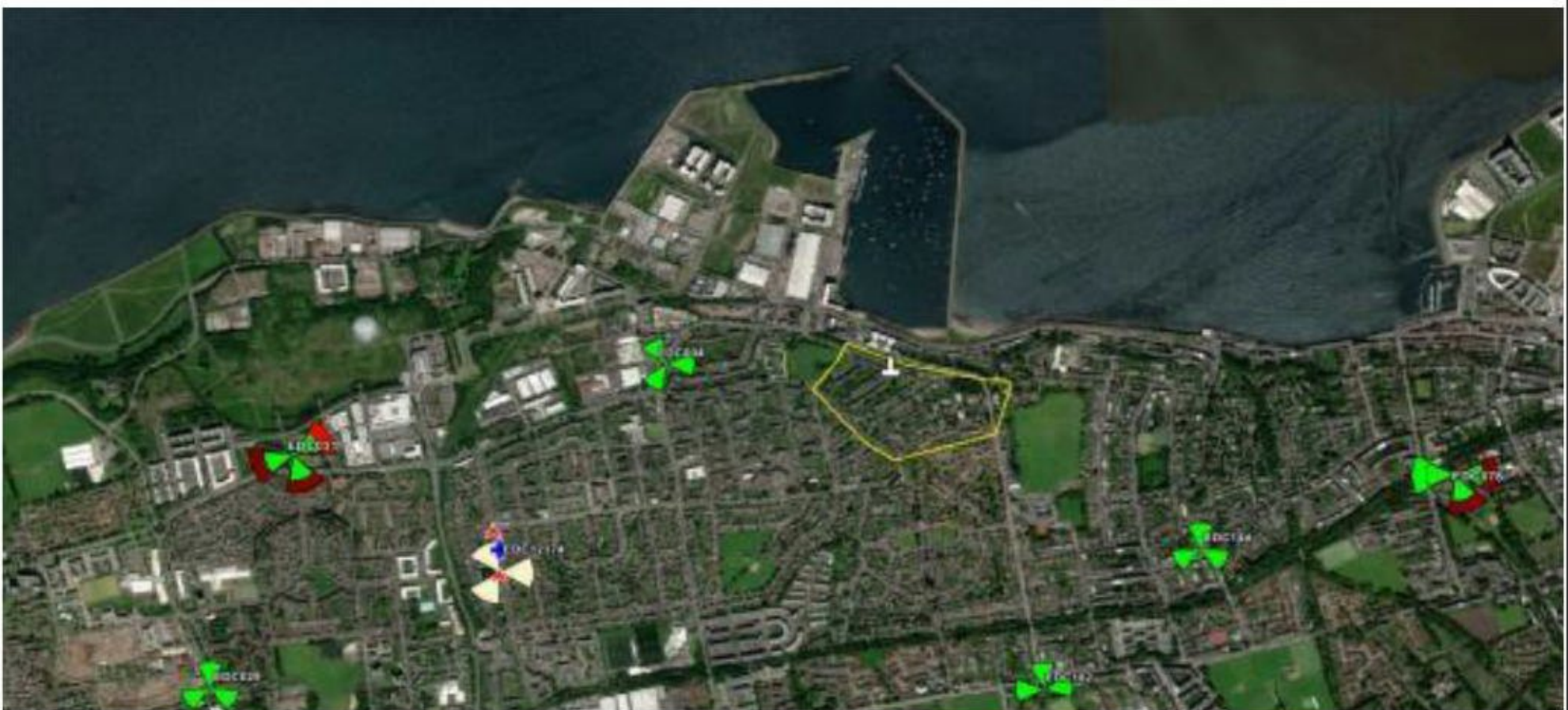
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

Enclosed map showing the cell centre and adjoining cells:

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area (shown as by the red outline) and existing H3G (Three) UK sites are illustrated within Figure 4 below:

**Figure 4** - Coverage Map: Proposed installation must be located close to the area shown below.



Type of Structure	
Description: Proposed Phase 8 Monopole c/w wrapround Cabinet at base.	
Overall Height:	See drawings
Height of existing building	N/a
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
<p>The proposed installation is an H3G LTE (Three) Phase 8 Monopole c/w wrap-around cabinet and 3 no. additional equipment cabinets which will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities.</p> <p>In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.</p>

#### 4. Technical Information

<p>ICNIRP Declaration attached</p> <p>ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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. When</p>	Yes	
--	-----	--

determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		
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## 5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 5G coverage for H3G LTE, improving service in and around this area subject to this application. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.</p>

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

Discounted Options
<p>In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.</p> <p>This sequential approach is outlined below:</p> <ul style="list-style-type: none"> <li>a) Mast and Site Sharing</li> <li>b) Existing Buildings Structures</li> <li>c) Ground Bases Installations</li> </ul> <p>In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.</p>

### Discounted Options and National Planning Policy:

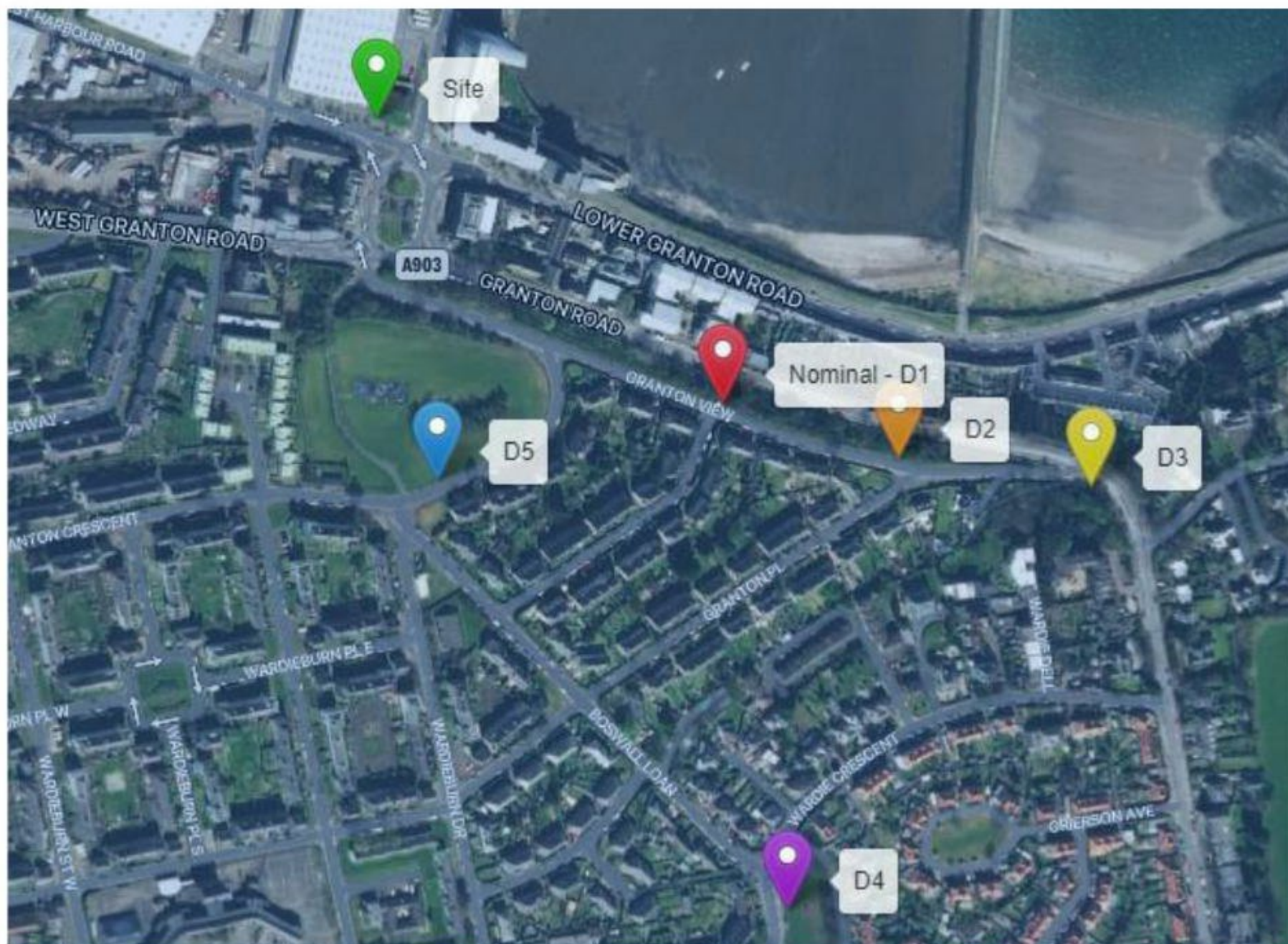
<p>The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:</p> <p><i>“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.</i></p> <p>Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast</p>
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infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A street pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated herein, together with site locations that were investigated and subsequently discounted.

**Discounted Options:**

Site	NGR	Discounted Reason
D1 – Granton View	323909 , 676961	Discounted option due to pavement width restrictions, proximity to residential housing and an electrical substation.
D2 – Granton View	324025 , 676922	Discounted option due to pavement width restrictions and proximity to residential housing.
D3 – Granton Road	324152 , 676901	Discounted option due to pavement width restrictions and visibility splay concerns.
D4 – Grierson Road	323946 , 676626	Discounted option due to pavement width restrictions and proximity to residential housing.
D5 – Granton Crescent	323719 , 676913	Discounted option due to pavement width restrictions and proximity to residential housing.



## 7. Additional Relevant Information

### Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the local planning authority area and specifically in this instance, to enhance 5G coverage levels in and around the site subject to this application.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

#### **DEVELOPMENT PLAN POLICY:**

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

*"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."*

#### **NATIONAL PLANNING POLICY:**

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

*“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”*

It continues in Paragraph 113

*“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”*

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

*“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”*

In addition to the above, we would also draw to your attention a recent Appeal Decision which followed on the back of a refused planning application within Walworth, London, SE17 3DU. The application (ref: 20/AP/1187) was refused on the following grounds: - 1) The 20m monopole does not comply with part (a) of Part A.1 of 16 of the GPDO 2015 and 2) The proposed cabinets and monopole would introduce excessive clutter on the footway, disrupting pedestrians. The appeal was brought by Hutchison 3G (UK) Ltd against the Council of the London Borough of Southwark. The appeal was allowed on the 10<sup>th</sup> November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

## **Conclusion**

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.

Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation 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.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

### Contact Details

Name: (Agent)	<u>Tom Gallivan</u>	Telephone:	<u>[REDACTED]</u>
Operator:	<u>H3G</u>	Fax no:	<u>N/A</u>
Address:	<u>Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP</u>	Email Address:	<u>[REDACTED]</u>
Signed:	<u>[REDACTED]</u>	Date:	<u>29<sup>th</sup> November 2021</u>
Position:	<u>Planning Manager</u>	Company:	<u>Dot Surveying</u>
		(On behalf of above operator)	

## **Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines**

Three UK Limited  
Star House  
20 Grenfell Road  
Maidenhead

Declares that the proposed equipment and installation as detailed in the attached planning / General Permitted Development Order application at:

(Site Address)  
GRANTON ROAD  
GRANTON  
EDINBURGH  
LOTHIAN  
EH5 1AB

is designed to be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection<sup>1</sup> as expressed in EU Council Recommendation 1999/519/EC of 12 July 1999 "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

Date: 21.04.21  
Name: GBC  
Position: Design

Great British Communications Ltd  
Lapwing House  
Block 3 Forward Point  
Tan House Lane  
Widnes  
Cheshire  
WA8 0SL

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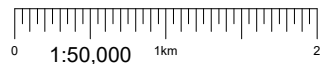
<sup>1</sup> The updated ICNIRP Guidelines published in March 2020 are covered by this declaration

SITE LOCATION



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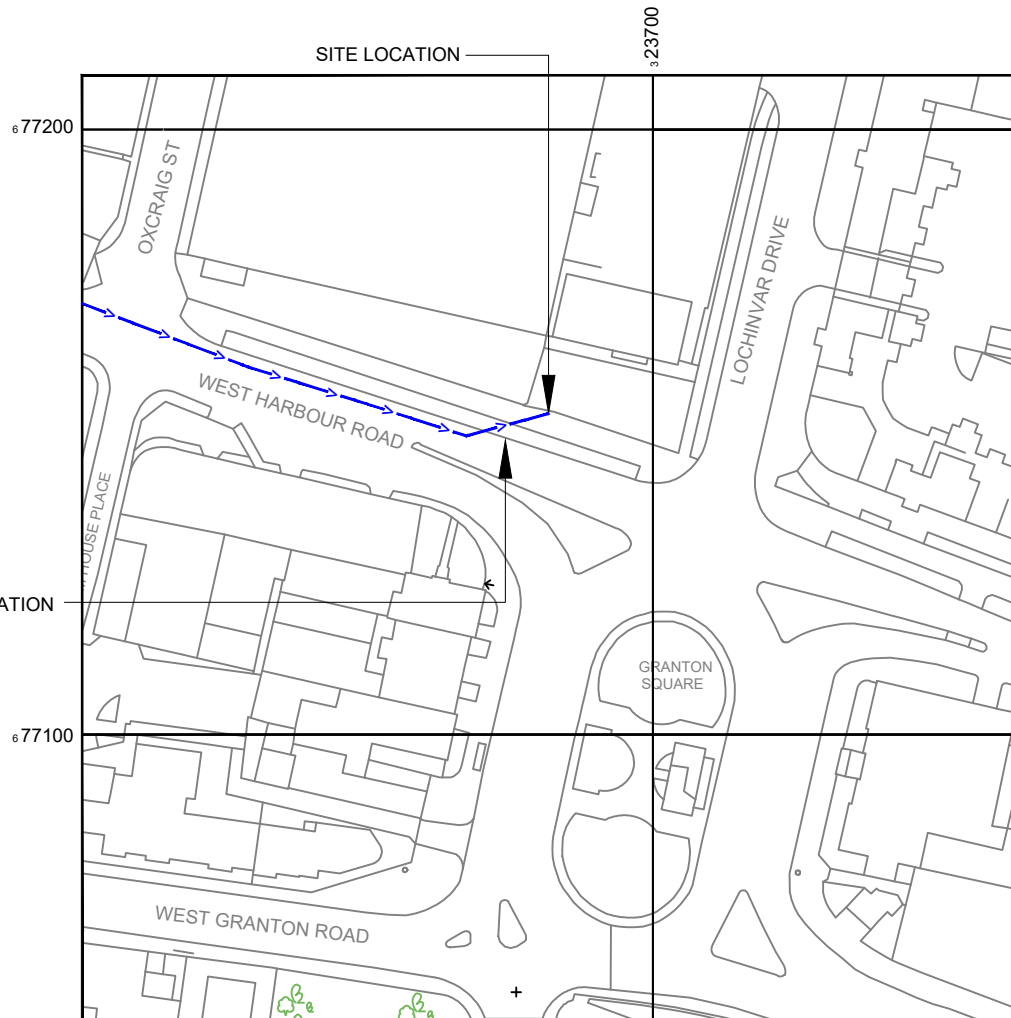
SITE AREA PLAN



SITE PHOTOGRAPH



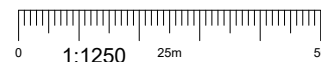
SITE LOCATION



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NGR E: 323683 N: 677153

SITE LOCATION PLAN



GOOGLE MAPS QR CODE

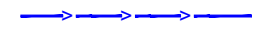
GOOGLE MAPS - <https://goo.gl/maps/LEt1qmJB8d5sMsWW8>

STREETVIEW - <https://goo.gl/maps/gxsnn8GADo3uNGyZ6>

NOTES:

- ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Access Route To Site:



REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**

Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
[www.gbcservices.co.uk](http://www.gbcservices.co.uk)

Site Name: WEST HARBOUR ROAD SW

3UK Nominal ID: EDC16648

Address:  
WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title: 002 SITE LOCATION PLAN

Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
EDC412/81993/EH0737

Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A Issue: A

100mm  
150mm  
10mm



APPROX RIDGE HEIGHT  
7.0m AGL

CAR PARK

+4.0m  
AMSL

GROUND  
LEVEL ±0.00m

GRASS VERGE

FOOTPATH

GRASS VERGE

EXISTING TREES 6.0m HIGH

EXISTING LAMP POST 10.0m HIGH

PROPOSED CRANE LOCATION (INDICATIVELY SHOWN,  
CRANE SPECIALIST TO CONFIRM LOCATION)

WEST HARBOUR ROAD (20 M P H)

CENTRAL RESERVATION

ELEVATION A



NOTES:  
CRANE LOCATION INDICATIVELY SHOWN. CRANE SPECIALIST  
TO CONFIRM LOCATION.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison  
Networks (UK)  
Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address:  
**WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **005 CRANE LOCATION**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

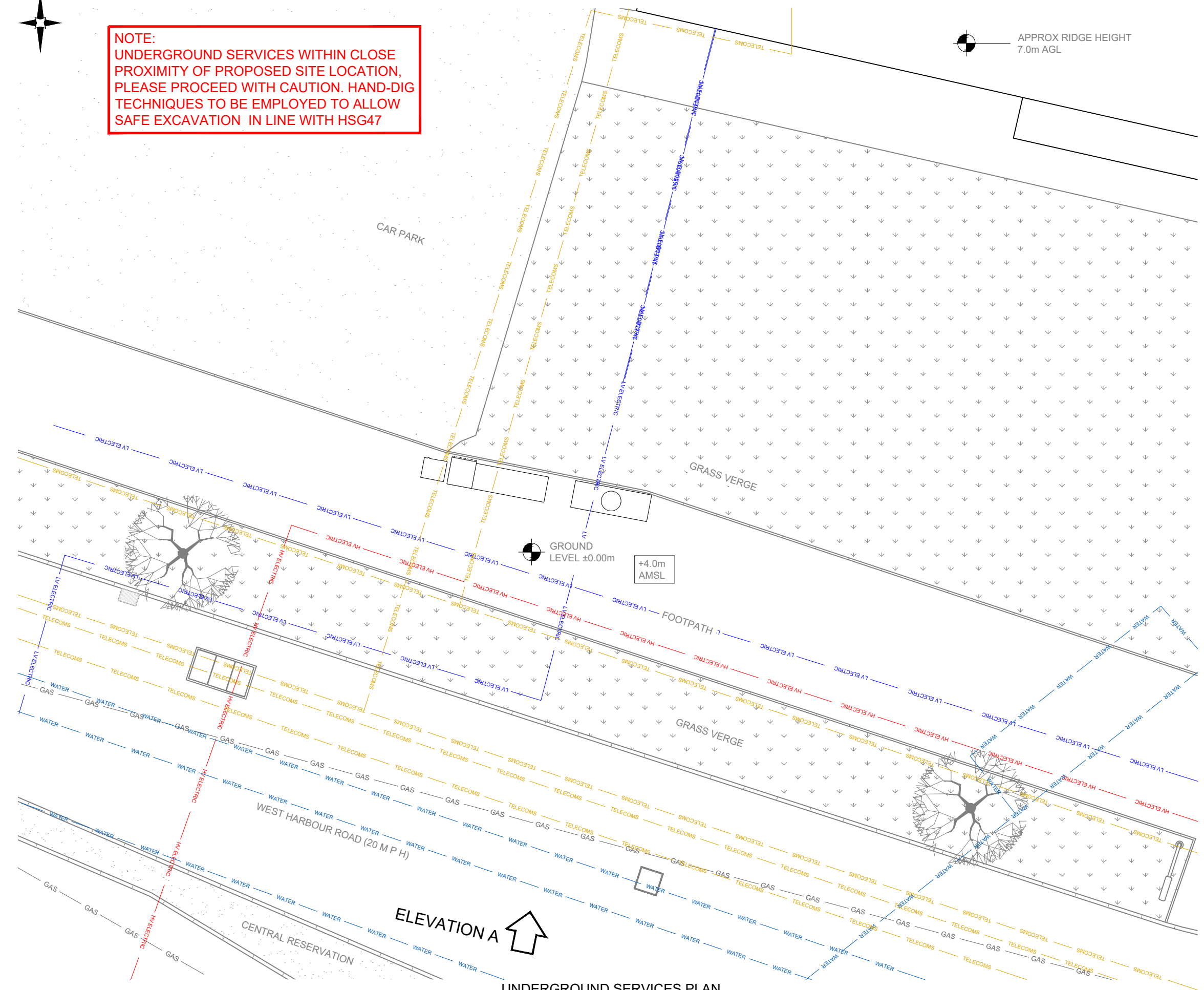
Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
150mm  
10mm



**NOTE:**  
 UNDERGROUND SERVICES WITHIN CLOSE PROXIMITY OF PROPOSED SITE LOCATION, PLEASE PROCEED WITH CAUTION. HAND-DIG TECHNIQUES TO BE EMPLOYED TO ALLOW SAFE EXCAVATION IN LINE WITH HSG47

APPROX RIDGE HEIGHT  
 7.0m AGL

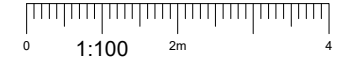


GROUND LEVEL ±0.00m  
 +4.0m AMSL

100mm  
 150mm  
 10mm



UNDERGROUND SERVICES PLAN



NOTES:  
 1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

SERVICES:

- WATER — WATER — WATER —
- LV ELECTRIC — LV ELECTRIC —
- HV ELECTRIC — HV ELECTRIC —
- GAS — GAS — GAS —
- TELECOMS — TELECOMS —

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:  
  
 Great British Communications  
 Lapping House, Block 3 Forward Point,  
 Tan House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address:  
**WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE**

Title: **006 UNDERGROUND SERVICES PLAN**

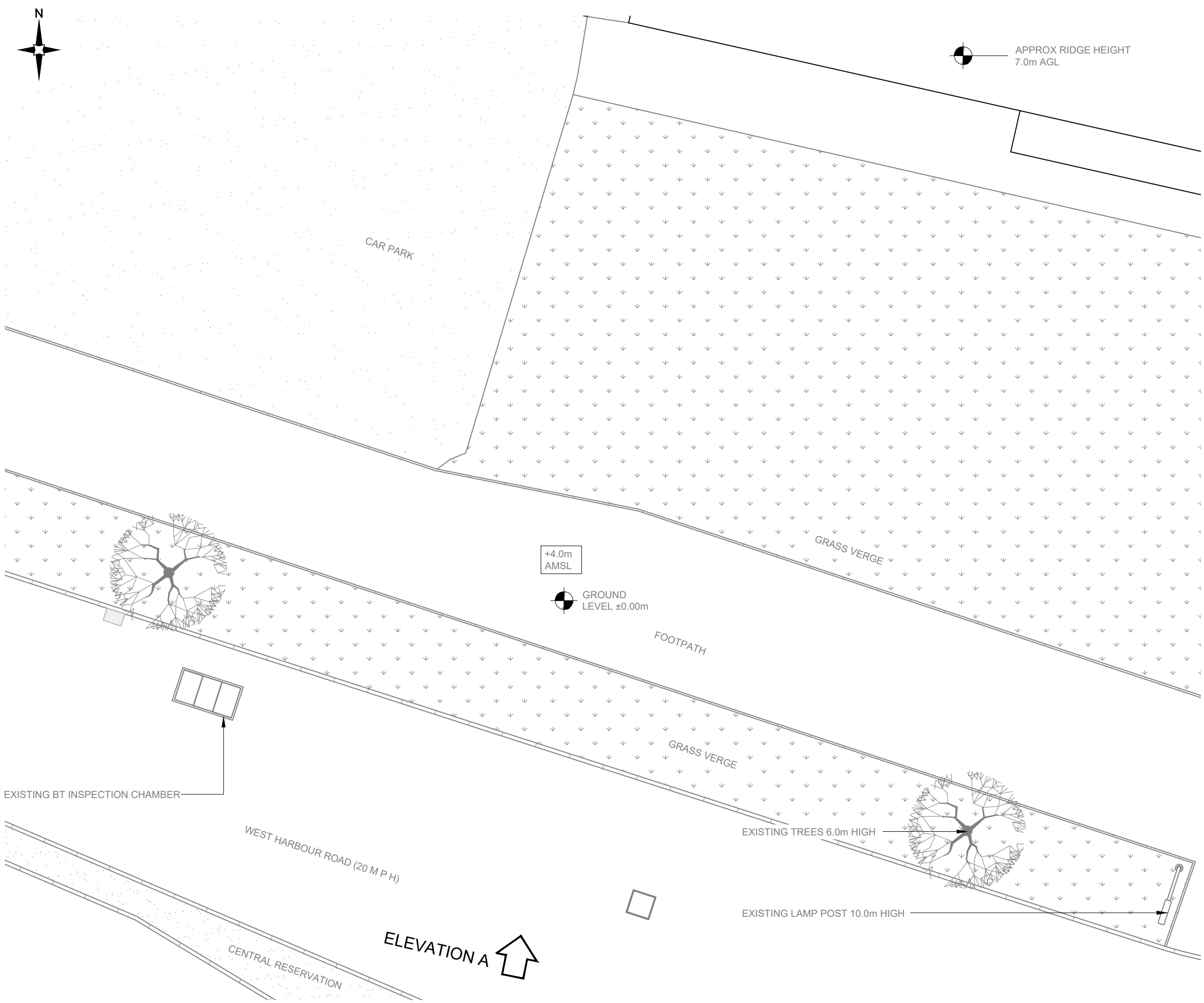
Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**





NOTES:  
 1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:  
  
**Great British Communications**  
 Lapping House, Block 3 Forward Point,  
 Ton House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE**

Title: **100 EXISTING SITE PLAN**

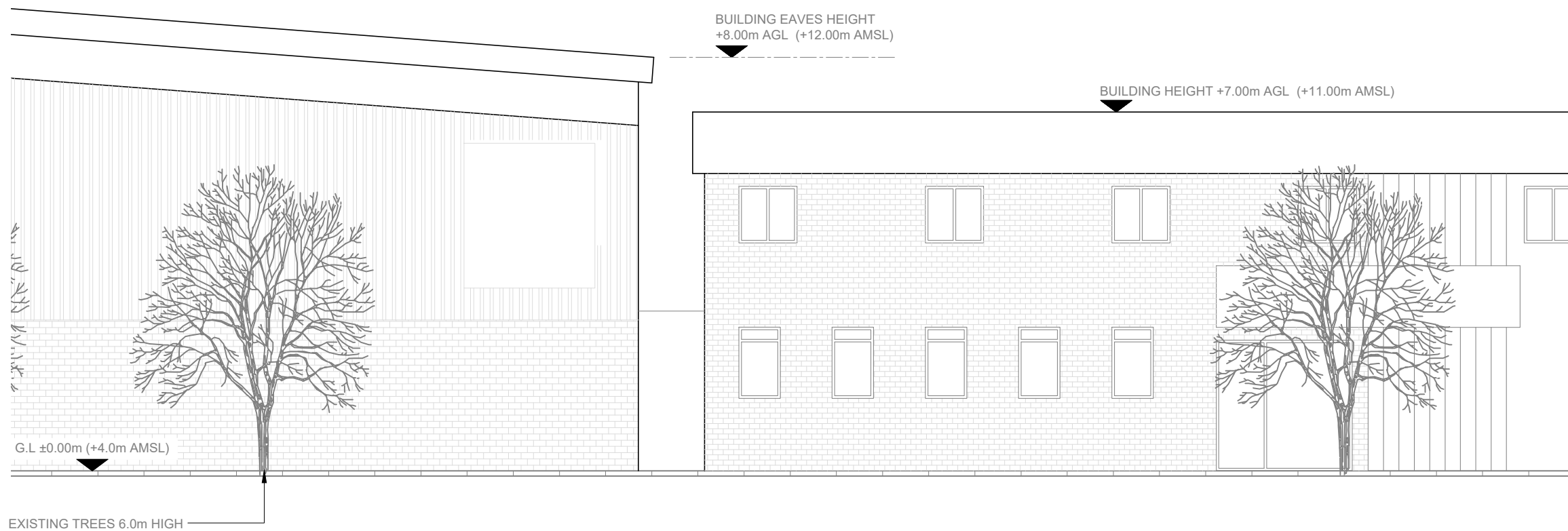
Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

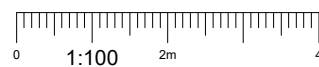
MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
 50mm  
 10mm



EXISTING ELEVATION A



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
 Lapping House, Block 3 Forward Point,  
 Tan House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name:

WEST HARBOUR ROAD SW

3UK Nominal ID:

EDC16648

Address:

WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE

Title:

150 EXISTING SITE ELEVATION

Project:

UNILATERAL SW

Purpose of Issue:

PLANNING

MBNL/TM/H3G Cell ID:

EDC412/81993/EH0737

Drawing No:

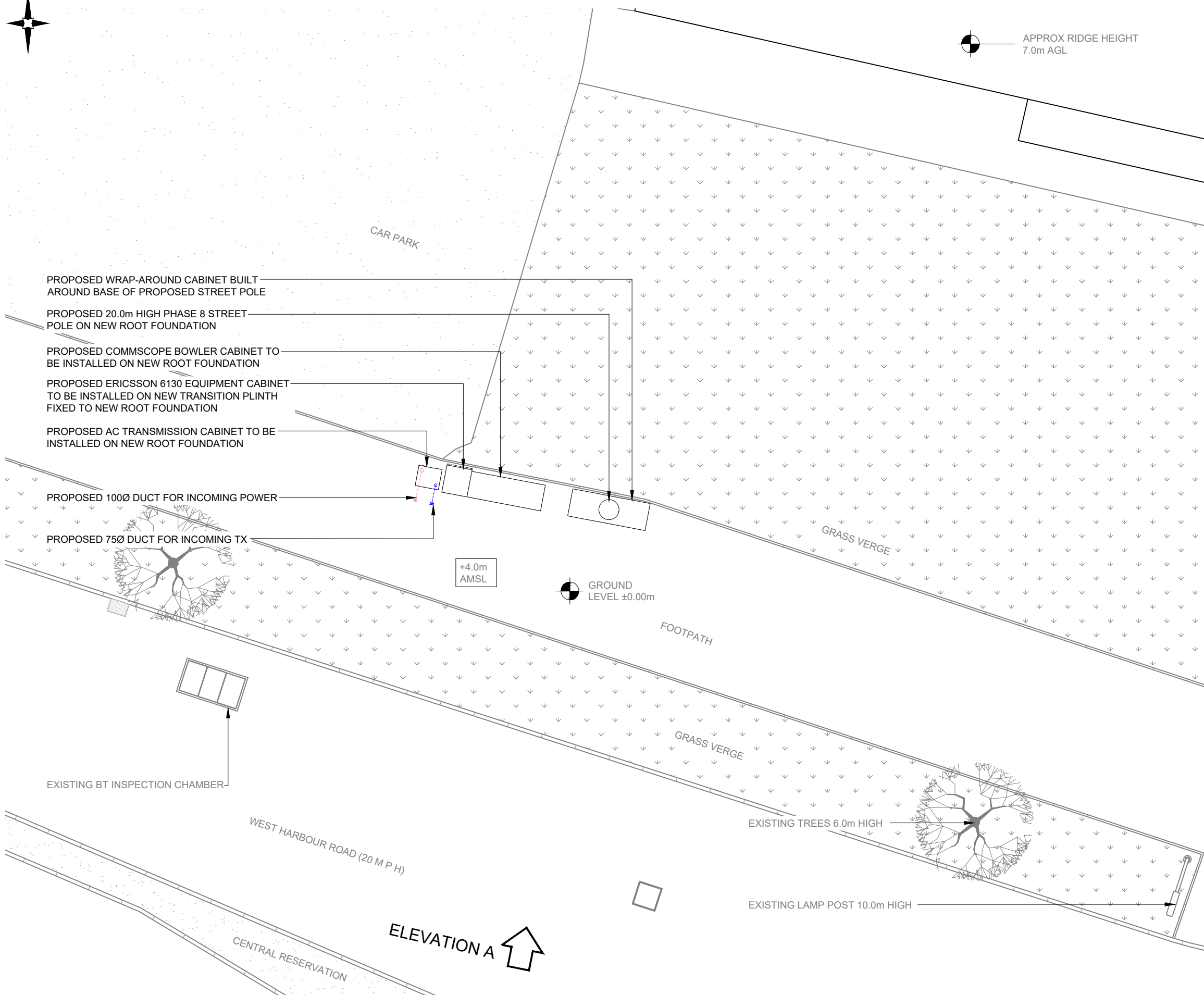
EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

Issue:

A



APPROX RIDGE HEIGHT  
7.0m AGL



NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:  
**GBC**  
Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

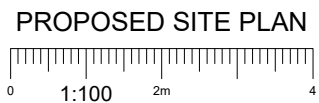
Title: **215 PROPOSED SITE PLAN**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**



100mm  
150mm  
10mm

PROPOSED GPS MODULE MOUNTED AT TOP OF POLE

C/L OF PROPOSED ANTENNAS +19.41m AGL (+23.41m AMSL)

C/L OF PROPOSED ANTENNAS +17.75m AGL (+21.75m AMSL)

TOP OF PROPOSED STREET POLE +20.00m AGL (+24.00m AMSL)

PROPOSED 20.0m HIGH PHASE 8 STREET POLE ON NEW ROOT FOUNDATION

BUILDING EAVES HEIGHT +8.00m AGL (+12.00m AMSL)

BUILDING HEIGHT +7.00m AGL (+11.00m AMSL)

G.L ±0.00m (+4.0m AMSL)

EXISTING TREES 6.0m HIGH

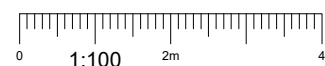
PROPOSED AC TRANSMISSION CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED ERICSSON 6130 EQUIPMENT CABINET TO BE INSTALLED ON NEW TRANSITION PLINTH FIXED TO NEW ROOT FOUNDATION

PROPOSED WRAP-AROUND CABINET BUILT AROUND BASE OF PROPOSED STREET POLE

PROPOSED COMMSCOPE BOWLER CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED SITE ELEVATION A



NOTES:

- ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
 Lapping House, Block 3 Forward Point,  
 Tan House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name: WEST HARBOUR ROAD SW

3UK Nominal ID: EDC16648

Address: WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE

Title: 265 PROPOSED SITE ELEVATION

Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
 EDC412/81993/EH0737

Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A Issue: A

100mm

150mm

10mm



## **Appendix 3 – Post Application Correspondence**

**Correspondence received from the Edinburgh City Council**

**EDC16648 – West Harbor Road Street work appeal**

- **Copy of Officers Report refusing application**

# Report of Handling

**Application for Planning Permission  
Proposed Telecoms Apparatus 43 Metres Northeast Of , 1A West  
Harbour Road, Edinburgh**

**Proposal: A new 20m high 'slim line' streetpole with built-in cabinet and 3 No. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area.**

**Item – Local Delegated Decision  
Application Number – 21/06399/FUL  
Ward – B04 - Forth**

## **Recommendation**

It is recommended that this application be **Refused** subject to the details below.

## **Summary**

The proposal will not have an adverse visual impact on the character of the surrounding area or the setting of listed buildings. However, the proposal would prejudice the implementation of an identified public transport safeguard and would be detrimental to a path which forms part of the core path network. The proposal is contrary to the relevant policies within the adopted Edinburgh Local Development Plan and Scottish Planning Policy, paragraphs 269-291.

## **SECTION A – Application Background**

### **Site Description**

The site comprises a section of shared pavement/cycleway situated on the northern side of Western Harbour Road. The surrounding area has a mixed industrial and residential character and consists of warehouses, historical tenements and modern build flats.

### **Description Of The Proposal**

The proposal seeks planning permission for the installation of a 20 metre high ground based mast and associated cabinets on the site.

### **Supporting Information**

### **Relevant Site History**

No relevant site history.

### **Consultation Engagement**

Transportation Planning

### **Publicity and Public Engagement**

**Date of Neighbour Notification:** 24 February 2022

**Date of Advertisement:** 7 January 2022

**Date of Site Notice:** 7 January 2022

**Number of Contributors:** 17

## **Section B - Assessment**

### **Determining Issues**

This report will consider the proposed development under Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997 (the 1997 Act):

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling material considerations for not approving them?

If the proposals do not comply with the development plan, are there any compelling material considerations for approving them?

In the assessment of material considerations this report will consider:

- the Scottish Planning Policy presumption in favour of sustainable development, which is a significant material consideration due to the development plan being over 5 years old;
- equalities and human rights;
- public representations; and
- any other identified material considerations.

### **Assessment**

To address these determining issues, it needs to be considered whether:

#### **a) The proposals comply with the development plan?**

The Development Plan comprises the Strategic and Local Development Plans. The relevant Edinburgh Local Development Plan 2016 (LDP) policies to be considered are:

- LDP Resources Policy RS 7

- LDP Environment Policies Env 3
- LDP Transport Policies Tra 7 and Tra 9

The non-statutory Guidance on Communications Infrastructure is a material consideration that is relevant when considering policy RS 7.

#### Public Transport Proposals and Safeguards

The Roads Authority has raised an objection to the proposal on the grounds that the proposal is within the limits of deviation of the proposed tram route.

Within the LDP, the application site is designated as being in close proximity to both the future tram route safeguard, and a future tram stop. The proposal therefore has the potential to significantly prejudice the implementation of an identified public transport proposal.

The proposal is contrary to policy Tra 7 of the local development plan.

#### Cycle and Footpath Network

The site is situated on a paved area which is a shared pavement/cycleway which is actively utilised by both pedestrians and cyclists, and which forms part of the Council's Core Paths Network (CEC: 6 FIRTH OF FORTH). The proposal would obstruct a section of the path and has the potential to interfere with the movement of both pedestrians and cyclists.

The proposal is contrary to policy Tra 9 of the local development plan.

#### Visual Impact on the Surrounding Area

The surrounding area has a mixed character which encompasses industrial units, modern build flatted developments, traditional tenements and historic Georgian buildings. The modern build flatted development situated directly to the east of the application site extends to a similar height as the proposed development, and the proposed mast will not have an adverse impact on the character and appearance of the surrounding area.

The proposal complies with policy RS 7 of the local development plan.

#### Setting of Listed Building

Several Category B buildings are situated directly to the south of the site including the Former Bonded Warehouse and No 1-4 Granton Square. The mast will be sited in a suitable location in respect of these buildings which will not interfere with the interpretation of their respective facades.

The proposal will not have an adverse impact on the setting of listed buildings and complies with policy Env 3 of the local development plan



## **Conclusion in relation to the Development Plan**

The proposal complies with policies RS7 and Env 3 of the development plan. However, the proposal is contrary to policies Tra 7 and Tra 9.

### **b) There are any other material considerations which must be addressed?**

The following material planning considerations have been identified

#### Legislative Considerations

This application constitutes an application for planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended). The applicant has stated that their justification for the submission of a planning application was due to the proximity of category B listed buildings to the application site, and a belief that this would exclude the proposal from being considered permitted development under Class 67 (23) of the Town and Country Planning (General Permitted Development (Scotland) Order 1992 (as amended).

Following assessment of the proposal after submission, the applicant was been advised that the proposed development is not located within any of the designations listed in Class 67 (2) of the above order which would exclude it from being considered permitted development, subject to the prior approval of the planning authority. The applicant has been invited by the planning authority to withdraw the current application and submit an application under Class 67 (23) (b) of the above order to determine whether the prior approval of the planning authority is required in respect of the siting and appearance of the development, but has elected not to do so. The applicant has requested that the planning authority determine the application which has been submitted.

The Town and County Planning (Scotland) Act 1997 (as amended) does not include any legislative provision which allows a planning authority to unilaterally withdraw a planning application without the agreement or consent of the applicant. In the absence of the agreement of the applicant to withdraw the application, the planning authority is required to determine the application as submitted.

#### SPP - Sustainable development

Scottish Planning Policy (SPP) is a significant material consideration due to the LDP being over 5 years old. Paragraph 28 of SPP gives a presumption in favour of development which contributes to sustainable development. Paragraph 29 outlines the thirteen principles which should guide the assessment of sustainable development.

The proposal does not accord with Paragraph 29 of SPP as it would not support the delivery of sustainable public transport infrastructure.

#### Emerging policy context

The Draft National Planning Framework 4 is being consulted on at present and has not been adopted. As such, little weight can be attached to it as a material consideration in the determination of this application.

While City Plan 2030 represents the settled will of the Council, it has not yet been submitted to Scottish Ministers for examination. As such, little weight can be attached to it as a material consideration in the determination of this application.

### Equalities and human rights

Due regard has been given to section 149 of the Equalities Act 2010. No impacts have been identified.

Consideration has been given to human rights. No impacts have been identified through the assessment and no comments have been received in relation to human rights.

### Public representations

A summary of the representations is provided below:

#### *material considerations*

- Proposal would be detrimental to a path which forms part of the core paths network
- Proposal would have an adverse impact on the visual amenity of neighbouring residents
- Proposal would have an adverse impact on the character and appearance of the surrounding area
- Proposal would have an adverse impact on the setting of listed buildings.

#### *non-material considerations*

- Proposal will have adverse impacts on the health of neighbouring residents - Matters relating to the health standards of telecommunications infrastructure are not regulated by the planning system and are covered under separate legislation. The operator has submitted an ICNIRP declaration with the application.
- Proposal will have a negative impact on property value - The planning authority cannot consider the impact of a proposal on private property values.
- Private industry database used to select a location for a mast.

### **Conclusion in relation to identified material considerations**

The proposal does not accord with paragraph 29 of Scottish Planning Policy.

### **Overall conclusion**

The proposal will not have an adverse visual impact on the character of the surrounding area or the setting of listed buildings. However, the proposal would prejudice the implementation of an identified public transport safeguard and would be detrimental to a path which forms part of the core path network. The proposal is

contrary to policies Tra 7 and Tra 9 of the adopted Edinburgh Local Development Plan and SPP paragraphs 269-291.

## **Section C - Conditions/Reasons/Informatives**

The recommendation is subject to the following;

### **Reason for Refusal**

1. The proposal is contrary to Scottish Planning Policy (SPP) 269-291 as it would have a detrimental impact on the Council's ability to facilitate travel by public transport.
2. The proposal is contrary to policy Tra 7 of the adopted Edinburgh Local Development Plan as it would prejudice the implementation of a public transport proposal.
3. The proposal is contrary to policy Tra 9 of the adopted Edinburgh Local Development Plan as it would be detrimental to a path which forms part of the core paths network.

### **Background Reading/External References**

To view details of the application go to the [Planning Portal](#)

**Further Information - [Local Development Plan](#)**

**Date Registered: 6 December 2021**

### **Drawing Numbers/Scheme**

01 - 07

Scheme 1

**David Givan**  
**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**

Contact: James Allanson, Planning Officer  
E-mail: [james.allanson@edinburgh.gov.uk](mailto:james.allanson@edinburgh.gov.uk)



## Appendix 1

### **Consultations**

NAME: Transport Planning

COMMENT: The application should be refused.

Reasons;

The proposed telecoms apparatus is within the Limits of Deviation of the future Edinburgh Tram Line.



**Appendix 4 – DECISION NOTICE**

**CELL REFERENCE EDC16648 – WEST HARBOUR ROAD STREET  
WORKS**

**PLANNING APPEAL SUBMISSION AGAINST REFUSAL ISSUED  
BY THE EDINBURGH CITY COUNCIL AGAINST APPLICATION  
FOR PRIOR APPROVAL REFERENCE 21/06399/FUL**

**COPY OF DECISION NOTICE**

Dot Surveying Ltd.  
FAO: Tom Gallivan  
14 Inverleith Place  
Edinburgh  
EH3 5PZ

CK Hutchison Networks (UK) Ltd.  
Great Bingham's Mead  
Vastern Road  
Reading  
RG1 8DJ

**Decision date: 24 February 2022**

TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS  
**DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013**

A new 20m high 'slim line' streetpole with built-in cabinet and 3 No. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area.

At Proposed Telecoms Apparatus 43 Metres Northeast Of 1A West Harbour Road  
Edinburgh

**Application No:** 21/06399/FUL

**DECISION NOTICE**

With reference to your application for Planning Permission registered on 6 December 2021, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

**Conditions:-**

**Reason for Refusal:-**

1. The proposal is contrary to Scottish Planning Policy (SPP) 269-291 as it would have a detrimental impact on the Council's ability to facilitate travel by public transport.
2. The proposal is contrary to policy Tra 7 of the adopted Edinburgh Local Development Plan as it would prejudice the implementation of a public transport proposal.

3. The proposal is contrary to policy Tra 9 of the adopted Edinburgh Local Development Plan as it would be detrimental to a path which forms part of the core paths network.

Please see the guidance notes on our [decision page](#) for further information, including how to appeal or review your decision.

Drawings 01 - 07, represent the determined scheme. Full details of the application can be found on the [Planning and Building Standards Online Services](#)

The reason why the Council made this decision is as follows:

The proposal will not have an adverse visual impact on the character of the surrounding area or the setting of listed buildings. However, the proposal would prejudice the implementation of an identified public transport safeguard and would be detrimental to a path which forms part of the core path network. The proposal is contrary to the relevant policies within the adopted Edinburgh Local Development Plan and Scottish Planning Policy, paragraphs 269-291.

This determination does not carry with it any necessary consent or approval for the proposed development under other statutory enactments.

Should you have a specific enquiry regarding this decision please contact James Allanson directly at [james.allanson@edinburgh.gov.uk](mailto:james.allanson@edinburgh.gov.uk).



**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**



## NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at [www.eplanning.scot](http://www.eplanning.scot) or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email [localreviewbody@edinburgh.gov.uk](mailto:localreviewbody@edinburgh.gov.uk).

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

Business Centre G.2 Waverley Court 4 East Market Street Edinburgh EH8 8BG Email: [planning.support@edinburgh.gov.uk](mailto:planning.support@edinburgh.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100508847-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- Application for planning permission (including changes of use and surface mineral working).
- Application for planning permission in principle.
- Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

Is this a temporary permission? \*  Yes  No

If a change of use is to be included in the proposal has it already taken place?  
(Answer 'No' if there is no change of use.) \*  Yes  No

Has the work already been started and/or completed? \*

No  Yes – Started  Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant  Agent

## Agent Details

Please enter Agent details

Company/Organisation:	Dot Surveying Ltd		
Ref. Number:		You must enter a Building Name or Number, or both: *	
First Name: *	Tom	Building Name:	
Last Name: *	Gallivan	Building Number:	14
Telephone Number: *	07841104028	Address 1 (Street): *	Inverleith Place
Extension Number:		Address 2:	
Mobile Number:		Town/City: *	Edinburgh
Fax Number:		Country: *	United Kingdom
		Postcode: *	EH3 5PZ
Email Address: *	t.gallivan@dotsurveying.co.uk		

Is the applicant an individual or an organisation/corporate entity? \*

Individual  Organisation/Corporate entity

## Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	Great Bingham Mead
First Name: *		Building Number:	
Last Name: *		Address 1 (Street): *	Great Bingham Mead
Company/Organisation	CK Hutchison Networks (UK) Ltd	Address 2:	Great Bingham Mead, Vastern Road
Telephone Number: *	07841104028	Town/City: *	Reading
Extension Number:		Country: *	United Kingdom
Mobile Number:		Postcode: *	RG1 8DJ
Fax Number:			
Email Address: *	t.gallivan@dotsurveying.co.uk		

## Site Address Details

Planning Authority:

City of Edinburgh Council

Full postal address of the site (including postcode where available):

Address 1:

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

Post Code:

Please identify/describe the location of the site or sites

WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE

Northing

677153

Easting

323683

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

Yes  No

## Pre-Application Discussion Details Cont.

In what format was the feedback given? \*

Meeting  Telephone  Letter  Email

Please provide a description of the feedback you were given and the name of the officer who provided this feedback. If a processing agreement [note 1] is currently in place or if you are currently discussing a processing agreement with the planning authority, please provide details of this. (This will help the authority to deal with this application more efficiently.) \* (max 500 characters)

none noted

Title:

Other

Other title:

Edinburgh City Council

First Name:

Last Name:

Correspondence Reference  
Number:

Date (dd/mm/yyyy):

20/11/2021

Note 1. A Processing agreement involves setting out the key stages involved in determining a planning application, identifying what information is required and from whom and setting timescales for the delivery of various stages of the process.

## Site Area

Please state the site area:

10.00

Please state the measurement type used:

Hectares (ha)  Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

pavement

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

Yes  No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

Are you proposing any change to public paths, public rights of way or affecting any public right of access? \*

Yes  No

If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.

How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?

0

How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? \*

0

Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).

## Water Supply and Drainage Arrangements

Will your proposal require new or altered water supply or drainage arrangements? \*

Yes  No

Do your proposals make provision for sustainable drainage of surface water?? \* (e.g. SUDS arrangements) \*

Yes  No

Note:-

Please include details of SUDS arrangements on your plans

Selecting 'No' to the above question means that you could be in breach of Environmental legislation.

Are you proposing to connect to the public water supply network? \*

- Yes  
 No, using a private water supply  
 No connection required

If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).

## Assessment of Flood Risk

Is the site within an area of known risk of flooding? \*

Yes  No  Don't Know

If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.

Do you think your proposal may increase the flood risk elsewhere? \*

Yes  No  Don't Know

## Trees

Are there any trees on or adjacent to the application site? \*

Yes  No

If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.

## Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste (including recycling)? \*

Yes  No

If Yes or No, please provide further details: \* (Max 500 characters)

n/a

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

Yes  No

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

Yes  No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013) \*

Yes  No  Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

Yes  No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*  Yes  No

Is any of the land part of an agricultural holding? \*  Yes  No

Are you able to identify and give appropriate notice to ALL the other owners? \*  Yes  No

If you cannot trace all the other owners, can you give the appropriate notice to one or more owner? \*  Yes  No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate C

## Certificates

The certificate you have selected requires you to distribute copies of the Notice 1 document below to all of the Owners/Agricultural tenants that you provided previously. Please note that your planning authority may be required to place an advertisement in a local newspaper. You may wish to contact the planning authority for further guidance.

Notice 1 is required

I understand my obligations to provide the above notice before I can complete the certificates. \*

# Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that – (1) –

I am/The applicant is unable to issue a certificate in accordance with Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 and in respect of the accompanying application;

(2) - No person other than myself/the applicant was an owner of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application.

or –

(3) - I have/the applicant has been unable to serve notice on any person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application relates.

or –

(2) - I have/The applicant has served notice on each of the following persons other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application, was owner [Note 2] of any part of the land to which the application/appeal was owner [Note 2] of any part of the land to which the application relates.

Name:

Address:

Date of Service of Notice: \*

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;

or –

(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:

Name:

Address:

Date of Service of Notice: \*



(4) – I have/The applicant has taken reasonable steps, as listed below, to ascertain the names and addresses of the other owners or agricultural tenants and \*have/has been unable to do so –

Tile search and adoption checks were undertaken

Signed: Tom Gallivan

On behalf of: CK Hutchison Networks (UK) Ltd

Date: 01/12/2021

Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? \*

Yes  No  Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

Yes  No  Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

Yes  No  Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

Yes  No  Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

Yes  No  Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- Site Layout Plan or Block plan.
- Elevations.
- Floor plans.
- Cross sections.
- Roof plan.
- Master Plan/Framework Plan.
- Landscape plan.
- Photographs and/or photomontages.
- Other.

If Other, please specify: \* (Max 500 characters)

Provide copies of the following documents if applicable:

- |  |  |
|--|--|
| A copy of an Environmental Statement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Design Statement or Design and Access Statement. *                                   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Flood Risk Assessment. *   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). * | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Drainage/SUDS layout. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Transport Assessment or Travel Plan  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Contaminated Land Assessment. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| Habitat Survey. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |
| A Processing Agreement. *  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A |

Other Statements (please specify). (Max 500 characters)

## Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Tom Gallivan  
 Declaration Date: 03/12/2021

## Payment Details

Online payment: XXXXXXXXXXXXXXXXXXXX;  
 Payment date: 03/12/2021 15:43:00

Created: 03/12/2021 15:43

## Mobile UK Briefing Note: 5G and Health

### What is 5G?

5G is short for 'fifth-generation mobile networks.' It is a truly transformational technology that will provide the underlying wireless infrastructure to support a host of new applications such as connected cars, virtual and augmented reality and the foundations for emerging smart city and Internet of Things (IoT) technologies.

### What are the features of 5G?

- **Faster download speeds:** 5G will provide much faster speeds than are achievable with today's 4G networks. 5G is expected to provide speeds between 1GBps and 10GBps. This would mean a full HD movie could be downloaded in 10 seconds as opposed to 10 minutes today.
- **Lower Latency:** 5G will also have significantly lower latency meaning very little lag (or buffering). This will enable applications that aren't possible today on mobile, such as multiplayer gaming, factory automation, and other tasks that demand quick responses.
- **Greater Capacity:** 5G will also have vastly greater capacity so that networks can better cope with not only the rapidly increasing data demands of customers today but the growth of high-demand applications being planned in the future.

### Are 5G and mobile signals-safe?

Exposure guidelines govern mobile signals in the UK, and the consensus of reviews by independent public health authorities, including Public Health England, expert groups and the World Health Organization (WHO) is that these guidelines provide protection for all people (including children) against all established health hazards.

## Exposure Limits and Guidelines

### UK and international guidelines for exposure limits

The exposure guidelines in the UK have been developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), following a comprehensive assessment of all the peer-reviewed scientific literature, including thermal and non-thermal effects. The guidelines are based on evaluations of biological effects that have been established to have health consequences. The WHO recommends that countries adopt the ICNIRP guidelines.

### Do current guidelines cover 5G?

Yes, current UK and international guidelines cover all frequencies used for mobile telephony, including those allocated to 5G.

The ICNIRP exposure guidelines for frequencies up to 300 GHz, published in 1998, are being revised and replaced and are expected to be published this year. It remains the opinion of ICNIRP, and other bodies such as the WHO, that there is no convincing evidence of adverse health effects at exposure below the guideline levels.

Ofcom recently (February 2020) extended its programme measuring EMF emissions from equipment used to transmit mobile signals and other wireless services to cover the frequencies being used for 5G. It measured 16 5G sites in towns and cities across the UK, focusing on areas where mobile use is likely to be highest. At every site, emissions were a small fraction of the levels included in international guidelines, as set by ICNIRP. And the maximum measured at any site was 1.5% of those levels.

### What kind of research exists on the possible health risks from exposure to 5G?

Information on new research and details of individual studies can be found in the EMF-Portal web database maintained by the RWTH Aachen University, Germany: <https://www.emf-portal.org/en>

The radio signal exposure characteristics of 5G are similar to those of existing mobile technologies. In particular, the new applications use similar transmitting powers and operate in similar frequency ranges. A European Commission expert committee concluded that current knowledge about how EMF interacts with the human body can be used to set exposure limits for the whole frequency range up to 300 GHz. Therefore, existing health risk assessments are valid independently of the wireless technology for the whole frequency range.

### Are RF signals a possible human carcinogen, and what does that mean?

In May 2011 a working group of the International Agency for Research on Cancer (IARC) classified RF electromagnetic fields as possibly carcinogenic to humans (Group 2B). The WHO explains that this is a category used when a causal association is

considered credible, but when chance, bias or confounding cannot be ruled out with reasonable confidence.

It is important to note that following the classification, the WHO has not recommended any changes to the exposure limits applicable to wireless networks and devices.

## What is the advice from Public Health England?

Public Health England's main advice, updated in May 2019, about radio waves from base stations is that:

*"The guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) should be adopted for limiting exposures. After reviewing the evidence, ICNIRP set guidelines to avoid excessive heating of the body and established the impact of exposure which can have detrimental effects. The ICNIRP guidelines apply to frequencies up to 300 GHz and cover exposures arising from new 5G base stations as well as from older technologies."*<sup>1</sup>

## What is the advice from the WHO on the mobile devices we use and health?

The position of the WHO regarding health effects from mobile phones is that:

*"A large number of studies have been performed over the last two decades to assess whether mobile phones pose a potential health risk. To date, no adverse health effects have been established as being caused by mobile phone use."*

## Are children at greater risk?

There have been many independent scientific reviews, and these have consistently concluded that the international guidelines are protective of all persons, including children.

*"Although a substantial amount of research has been conducted in this area, there is no convincing evidence that RF field exposure below guideline levels causes effects in adults or children."* (United Kingdom Health Protection Agency (2012)).<sup>2</sup>

## 5G Networks

### 5G is broadcast at a higher frequency, so does that mean higher exposure?

No, higher frequency does not mean higher exposure. Higher frequencies generally mean shorter ranges, lower power and, due to the increase of the available bandwidth, provides for the possibility of higher data rates. Current and future deployment will use frequencies already covered by existing exposure standards.

### Does higher data rates mean higher network exposure?

One of the goals of 5G deployments is to provide much higher data rates. This is needed to meet the high expectations and demands customers place on mobile communication applications and services both in their professional and private life. Based on the results from current 5G test networks, it is expected that the maximum exposure levels in areas around base stations will be similar to existing mobile services that use similar transmitter powers.

With the introduction of new technologies, there may be a small increase in the overall radio signal exposure level since new transmitters are active. Based on the transition from previous wireless technologies, we can expect that the overall exposure levels will remain relatively constant and well within the international exposure guidelines.

### Will 5G replace earlier mobile network technologies?

Early 5G deployments will be in locations where it is needed to supplement the capacity of current networks. Further rollouts will occur as demand dictates. It is expected that 5G will work alongside other technologies, i.e. 2G, 3G and 4G, to provide a continuity of service for customers who can continue to use their devices on existing networks.

### Does 5G mean an antenna on every street corner and inside all buildings?

Wherever possible, an operator will place these antennas at an existing site, potentially replacing one of the existing antennas on the site. Only where additional capacity and/or coverage is needed will additional sites be built.

## Contact Details

For further information, please contact Mobile UK on [info@mobileuk.org](mailto:info@mobileuk.org)

<sup>1</sup> Public Health England, 2019

<sup>2</sup> Health Effects from Radiofrequency Electromagnetic Fields – RCE 20, Advisory Group on Non-ionising Radiation (AGNIR), Health Protection Agency, April 2012

To

Name (if Known):

n/a Edinburgh Highways Officer Edinburgh Highways Officer

Address:

Dot Surveying Ltd Edinburgh Highways Department, High Street, Edinburgh

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATIONS 2013

Notice under regulation 15(1) of application for planning permission for service on owners and tenants of agricultural land

Proposed development at [Note 1]

WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE Northing - 677153, Easting - 323683

TAKE NOTICE:

That application is being made to the

[Note 2]

City of Edinburgh Council

by

[Note 3]

CK Hutchison Networks (UK) Ltd

For planning permission to

[Note 4]

In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

2. If you wish to obtain further information on the application or to make representations about the application, you should contact the council at

[Note 5]

Business Centre G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG

(The grant of planning permission does not affect owner's rights to retain or dispose of their property unless there is some provision to the contrary in an agreement or lease.

Signed

Tom Gallivan

On behalf of: \*

CK Hutchison Networks (UK) Ltd

Date

01/12/21

\* delete where inappropriate

[Note 1] Insert address of location of proposed development.

[Note 2] Insert name of Council.

[Note 3] Insert name of applicant.

[Note 4] Insert description of proposed development.

[Note 5] Insert address of Council.



**Planning Appeal in respect of application for prior approval  
for a proposed new telecoms installation at**

**EDC16648 — WEST HARBOUR ROAD GRANTON EDINBURGH**

**List of drawings submitted with application The Edinburgh  
City Council**

**Cell reference EDC16648**

**Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A**

**Drawing Title**

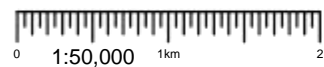
- 002 SITE LOCATION PLAN;
- 100 EXISTING SITE PLAN;
- 150 EXISTING SITE ELEVATION;
- 215 PROPOSED SITE PLAN;
- 265 PROPOSED SITE ELEVATION;

SITE LOCATION



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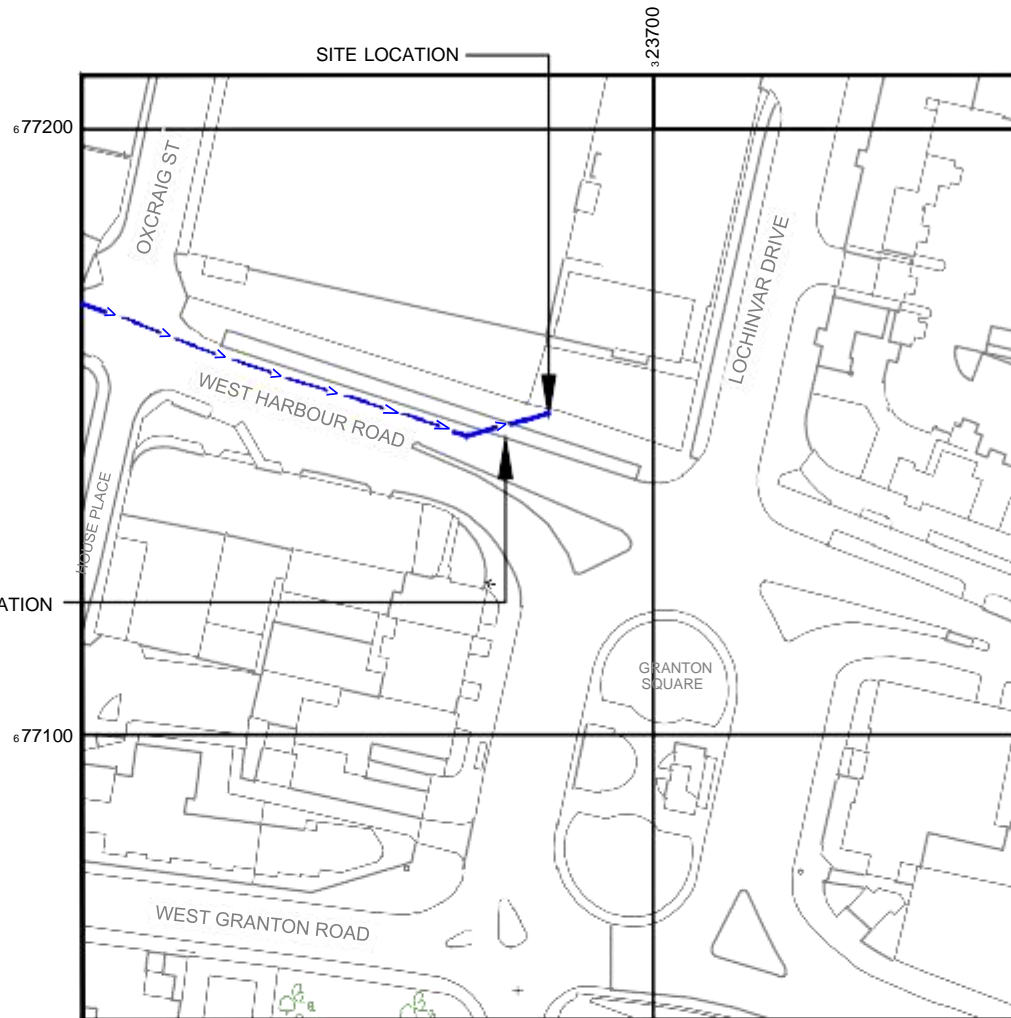
SITE AREA PLAN



SITE PHOTOGRAPH



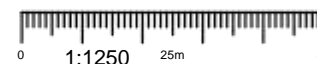
SITE LOCATION



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NGR E: 323683 N: 677153

SITE LOCATION PLAN



GOOGLE MAPS QR CODE

GOOGLE MAPS - <https://goo.gl/maps/LEt1qmJB8d5sMsWW8>

STREETVIEW - <https://goo.gl/maps/gxsnn8GADo3uNGyZ6>

NOTES:

- ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Access Route To Site:



REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**

Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lodding House, Block 3 Forward Point,  
Ten House Lane, Macclesfield, Cheshire, M45 0SL  
t. 44 (0)121 420 4128  
[www.gbcomms.co.uk](http://www.gbcomms.co.uk)

Site Name: WEST HARBOUR ROAD SW

BUK Nominal ID: EDC16648

Address: WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title: 002 SITE LOCATION PLAN

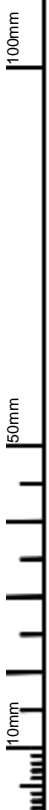
Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
EDC412/81993/EH0737

Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

Issue: A





APPROX RIDGE HEIGHT  
7.0m AGL

CAR PARK

+4.0m  
AMSL

GROUND  
LEVEL ±0.00m

GRASS VERGE

FOOTPATH

GRASS VERGE

PROPOSED CRANE LOCATION (INDICATIVELY SHOWN,  
CRANE SPECIALIST TO CONFIRM LOCATION)

EXISTING TREES 6.0m HIGH

EXISTING LAMP POST 10.0m HIGH

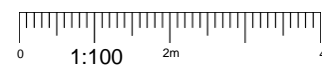
WEST HARBOUR ROAD (20 M P H)

CENTRAL RESERVATION

ELEVATION A



CRANE LOCATION



NOTES:  
CRANE LOCATION INDICATIVELY SHOWN. CRANE SPECIALIST  
TO CONFIRM LOCATION.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison  
Networks (UK)  
Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapwing House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **005 CRANE LOCATION**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
50mm  
10mm





APPROX RIDGE HEIGHT  
7.0m AGL

CAR PARK

+4.0m  
AMSL  
GROUND  
LEVEL ±0.00m

GRASS VERGE

FOOTPATH

GRASS VERGE

EXISTING BT INSPECTION CHAMBER

WEST HARBOUR ROAD (20 M P H)

CENTRAL RESERVATION

ELEVATION A

EXISTING TREES 6.0m HIGH

EXISTING LAMP POST 10.0m HIGH

EXISTING SITE PLAN

0 1:100 2m 4

NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison  
Networks (UK)  
Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:  
  
Great British Communications  
Lapwing House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address:  
**WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **100 EXISTING SITE PLAN**

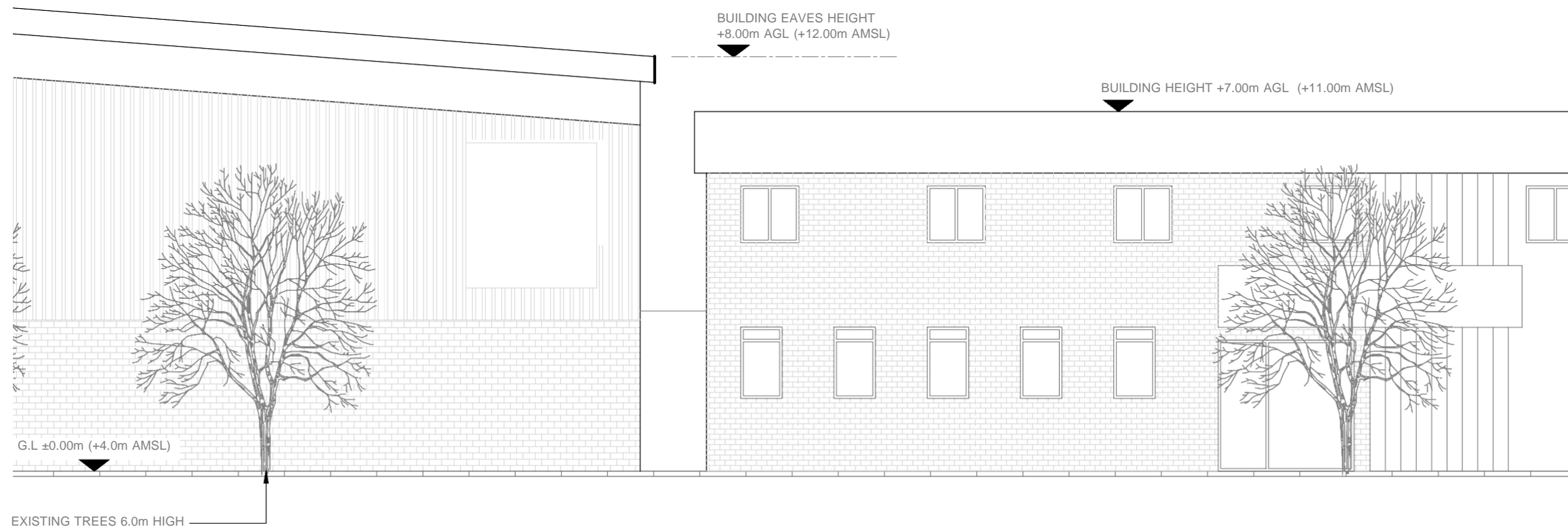
Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

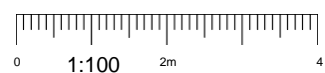
MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
50mm  
10mm



EXISTING ELEVATION A



NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:  
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Great British Communications  
Lapwing House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **150 EXISTING SITE ELEVATION**

Project: **UNILATERAL SW**

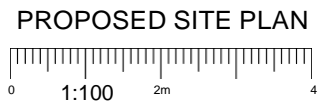
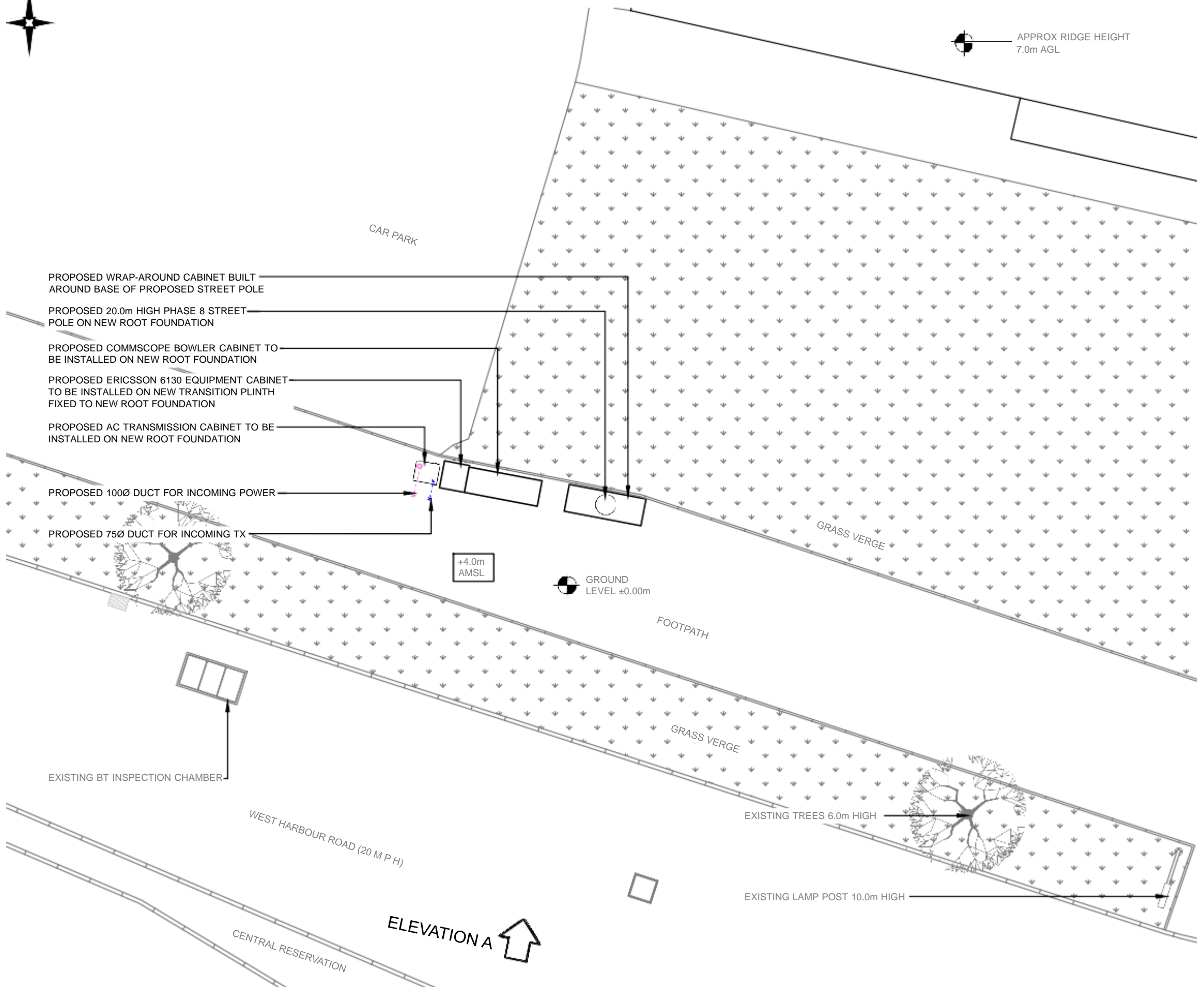
Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**



APPROX RIDGE HEIGHT  
7.0m AGL



NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:  
**GBC**  
Great British Communications  
Lapwing House, Block 3 Forward Point,  
Tan House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **215 PROPOSED SITE PLAN**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
50mm  
10mm

PROPOSED GPS MODULE MOUNTED AT TOP OF POLE

C/L OF PROPOSED ANTENNAS +19.41m AGL (+23.41m AMSL)

C/L OF PROPOSED ANTENNAS +17.75m AGL (+21.75m AMSL)

TOP OF PROPOSED STREET POLE +20.00m AGL (+24.00m AMSL)

PROPOSED 20.0m HIGH PHASE 8 STREET POLE ON NEW ROOT FOUNDATION

BUILDING EAVES HEIGHT +8.00m AGL (+12.00m AMSL)

BUILDING HEIGHT +7.00m AGL (+11.00m AMSL)

G.L. ±0.00m (+4.0m AMSL)

EXISTING TREES 6.0m HIGH

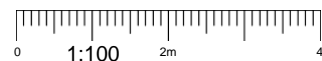
PROPOSED AC TRANSMISSION CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED ERICSSON 6130 EQUIPMENT CABINET TO BE INSTALLED ON NEW TRANSITION PLINTH FIXED TO NEW ROOT FOUNDATION

PROPOSED WRAP-AROUND CABINET BUILT AROUND BASE OF PROPOSED STREET POLE

PROPOSED COMMSCOPE BOWLER CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED SITE ELEVATION A



NOTES:

- 1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**

Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapwing House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name:

WEST HARBOUR ROAD SW

3UK Nominal ID:

EDC16648

Address:

WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title:

265 PROPOSED SITE ELEVATION

Project:

UNILATERAL SW

Purpose of Issue:

PLANNING

MBNL/TM/H3G Cell ID:  
EDC412/81993/EH0737

Drawing No:

EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

Issue:

A



## **CK Hutchison Networks (UK) Limited**

**Planning Appeal Statement for a Proposed Telecommunications Site at:**

**West Harbour Road  
Granton  
Edinburgh  
EH5 1HE**

**On behalf of:**

**CK Hutchison Networks (UK) Limited**

**Against:**

**The City of Edinburgh Council**

**Planning Reference: 21/06399/FUL**

**Date: 11<sup>th</sup> May 2022**

## CONTENTS

- Section 1 - Introduction**  
Details of the proposed development, the reason(s) for refusal and why an appeal is being submitted.
- Section 2 - Brief Overview of Telecommunications**  
A brief explanation behind mobile telecommunications networks.
- Section 3 - Cell Area and Description**  
Details of the intended target area.
- Section 4 - Sequential Approach to Site Selection**  
Details of the Application Site, including the process that was adopted in identifying the site.
- Section 5 - The Proposed Scheme and Planning Application**  
Pre-consultation and application process.
- Section 6 - Planning Policy and Other Material Considerations**  
Reference to the national and local planning policy that is applicable to the proposed development.
- Section 7 - Support for the Development**  
An assessment of the planning refusal, the requirement for a site, the proposed location and design.
- Section 8 - Conclusion**  
A summary of the refused application and why the appeal should be upheld.

## LIST OF APPENDICES

### Appendix 1 – Pre-Application Consultation

- Pre-application correspondence with Edinburgh City Council (the Local Planning Authority) – undertaken on the 20<sup>th</sup> November 2021. The communication was also addressed to the local councillors and the highways department within the City of Edinburgh Council. The e-mail included the following information:-
  - Site Detail Sheet
  - Drawings

### Appendix 2 – Copy of the supporting information which was included with the planning submission:-

- Site Specific Supplementary Information (SSSI) ‘Planning Statement’
- ICNIRP Declaration
- Drawings

### Appendix 3 – Copy of Officer’s report

### Appendix 4 – Decision Notice from the City of Edinburgh Council (24<sup>th</sup> February 2022)

### Appendix 5 – Forging Our Digital Future with 5G (Scottish Government)

### Appendix 6 – Connectivity and Climate Change (Mobile UK)

## 1.0 Introduction

- 1.1 The following appeal has been prepared and is lodged by Dot Surveying Ltd ('the agent'), on behalf of the original applicant: c/o Mr Tom Gallivan (in his capacity as agent), CK Hutchison Networks (UK) Limited, under the Town and Country Planning (Scotland) Act 1997 against a refusal by the local planning authority, in this case, the City of Edinburgh Council, to grant full planning permission for a free-standing telecommunications pole and associated equipment cabinets. The equipment is required for the purposes of providing a telecommunications network.
- 1.2 CK Hutchison Networks (UK) Limited 'The Appellant' will be responsible for construction of the site on behalf of the mobile operator CK Hutchison Networks (UK) Limited –, better known as 'Three'.
- 1.3 My name is Hannah Gibson BSc (Hons), and I am a Planner for Dot Surveying Ltd which is a multi-disciplinary surveying consultancy who specialise in a range of services, including telecommunications. Dot Surveying Ltd acted as the agent for the submission of an application for full planning permission submitted to the local planning authority here, the City of Edinburgh Council, on behalf the mobile CK Hutchison Networks (UK) Ltd.
- 1.4 An application for planning was registered by the local planning authority; the City of Edinburgh Council, on the 29<sup>th</sup> November 2021 under reference (21/06399/FUL). The application sought permission for the following apparatus:
- 1no. 20 metre high H3G Phase 8 Street Pole with wrap-around cabinet – coloured grey (RAL-7035)
  - 3no. equipment cabinets  
cabinet 1 – 600mm (w) x 500mm (d) x 1585mm (h)  
cabinet 2 – 650mm (w) x 700mm (d) x 950mm (h)  
cabinet 3 – 1900mm (w) x 600mm (d) x 1752mm (h)  
(all cabinets to be coloured grey RAL-7035).
- 1.5 The proposed site occupies an area of footpath adjacent to West Harbour Road, Granton, Edinburgh, EH5 1HE. The grid reference for the site is Easing: 323683 / Northing: 677153.
- 1.6 A decision notice, dated 24<sup>th</sup> February 2022, was subsequently received, to confirm that planning permission was refused on the following basis: -



*“1. The proposal is contrary to Scottish Planning Policy (SPP) 269-291 as it would have a detrimental impact on the Council's ability to facilitate travel by public transport.*

*2. The proposal is contrary to policy Tra 7 of the adopted Edinburgh Local Development Plan as it would prejudice the implementation of a public transport proposal.*

*3. The proposal is contrary to policy Tra 9 of the adopted Edinburgh Local Development Plan as it would be detrimental to a path which forms part of the core paths network.”*

- 1.7 In refusing the application, it is our opinion the local planning authority has not fully considered the significant efforts made by the Appellant to ensure the subject site and proposed design strikes an appropriate balance between operational requirements, and the significant improvements enhanced 5G will bring, along with the environmental considerations of all relevant National and Local Planning Policy, including the National Planning Policy Framework, Scottish Planning Policy, Edinburgh Local Development Plan and the National Park Partnership Plan.
- 1.8 As shall be explored in greater detail within this statement, the general target/cell area where CK Hutchison Networks (UK) Ltd require a site, is very constrained. Nevertheless, the Appellant has made a concerted effort to secure a site which achieves the operational requirements of CK Hutchison Networks (UK) Ltd while minimising any impact upon the surroundings. Please note, a minimum pole height of 20 metres is required to achieve the operational objectives of CK Hutchison Networks (UK) Ltd 'Three' in providing the necessary 5G service to the local area.
- 1.9 We do not consider the decision issued by the local planning authority; the City of Edinburgh Council, took sufficient or due weight to the importance placed on enhanced and improved telecommunications infrastructure within Policy RS 7 Telecommunications of the Edinburgh Local Development Plan, the National Planning Policy Framework and the Scottish Planning Policy.
- 1.10 Within this Appeal Statement of Case and the supporting documents, we seek to present a case and make arguments which will result in the appeal being allowed, thereby providing the infrastructure deemed essential by the government to bring the benefits of 5G to the area in and around West Harbour Road, Granton, Edinburgh.

## 2.0 Brief Overview of Telecommunications

- 2.1 Mobile phones and wireless devices have significantly evolved over the years and access to reliable communications are an integral part of society, both in terms of working and socialising. People are increasingly using their phones and other wireless technology to stream music, watch films and communicate on the move, while many in the current pandemic are working from home. In terms of OFCOM (The Office of Communications), the goal is to achieve comprehensive, high-quality coverage across the UK from a choice of network operators. Indeed, the Government recognises that widespread coverage is essential for people and businesses. As a result, mobile operators such as CK Hutchison Networks (UK) Ltd 'Three' must continually invest in their networks, to keep pace with ever-increasing demands.
- 2.2 A mobile network is made up of multiple base stations, each of which will transmit and receive radio signals to a particular geographical area. A mobile network is similar to a large jigsaw, with each base station responsible for a specific cell (e.g. geographic area) or piece of the jigsaw. A base station will consist of a free-standing structure such as a tower or mast and subject to operational and other limitations, may also be housed upon buildings or other structures.
- 2.3 A brief look at the evolution of mobile networks within the UK: -
- Wireless telecommunications began operating on analogue networks and allowed users to make and receive telephone calls. This early system is referred to as 1G (First Generation)
  - 2G refers to second generation of mobile networks which as opposed to 1G, the radio signal became digitalised. 2G allowed higher data speeds to be achieved (typically 64 kbps) with better quality voice calls. 2G also enabled users to make and receive text and multimedia messages (MMS).
  - 3G – Third Generation or Universal Mobile Telecommunications System (UMTS) was launched in the UK during 2003 and brought much faster data rates of up to 14 Mbps. The new technology allowed users basic internet access and the ability to send and receive e-mails etc.
  - 4G – Fourth Generation was launched in the UK during 2012 and introduced much faster data speeds compared with 3G, allowing users to browse web pages and stream videos/music etc, far more quickly than before.

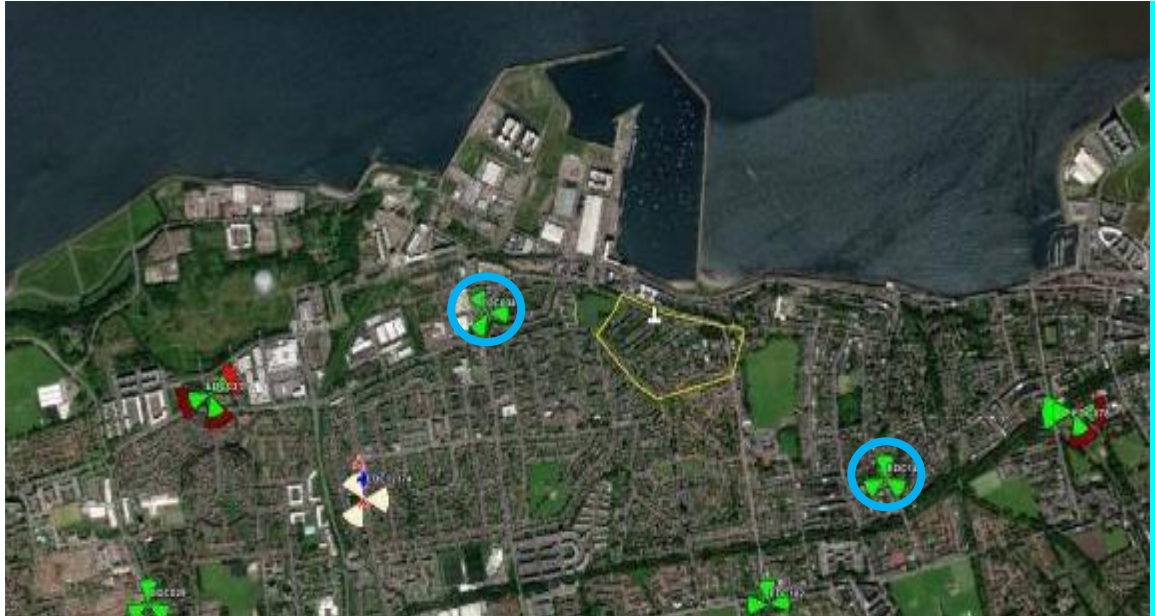
- 5G – The first 5G service was launched in the UK during spring 2019 and has the benefit of high-speed data with very low latency (delay). In short, 5G is estimated to be between 60 – 120 times faster than the average 4G latency and has the ability to handle large amounts of information.
- 2.4 While each generation brings technological advantages, due to the higher frequencies utilised, note 5G is expected to revolutionise mobile technology as we know it, the cell areas tend to be far smaller. For example, a 5G cell will have a typical radius of just 50 metres, which means the cell search areas are far smaller when compared with earlier network requirements. Consequently, the base stations must be situated within close proximity of the area they are designed to cover and will ultimately require the development of further base stations, sometimes within proximity of designated areas or sensitive locations.

### **3.0 Cell Area and Description**

- 3.1 In accordance with the Communications Act 2003, CK Hutchison Networks (UK) Ltd holds a licence to provide a mobile personal communications network in the UK. CK Hutchison Networks (UK) Ltd 'Three' has identified a requirement to provide new 5G (Fifth Generation) coverage, improving service in and around West Harbour Road.
- 3.2 The intended target/search area has a radius of approximately 100 metres and is centred around West Harbour Road, near to its junction with Lochinvar Drive, positioned on the north-east adjacent to our propose site.
- 3.3 As shall be explored within this statement of case, the Appellant has made a concerted effort to secure a site which considers the setting and appearance of a new telecommunications installation, minimising any impact upon the surrounding area.
- 3.4 As mentioned within the previous section and notwithstanding the constraints of 5G, a base station (site) will be responsible for a specific cell and its geographic position will very much depend upon the location of other telecommunications sites within a mobile operator's network. While CK Hutchison Networks (UK) Ltd 'Three' has operational sites within the wider area, the nearest is approximately 1 kilometre away, a distance too far from this particular cell. Therefore, a new site is required to meet their operational requirements and to provide much needed coverage to the local area. A plan showing the location of the intended cell is outlined in Figure 1, below. Please note, the plot was supplied to the City of Edinburgh Council as part of the pre-application communication (Appendix 1).

**Figure 1** – Plot showing the location of the intended cell/target area relative to other sites within the wider locality. The other sites are operated by CK Hutchison Networks (UK) Ltd ‘Three’ and positioned too far from this particular cell.

The location of the intended cell/target area is circled yellow. For ease of reference, the operational sites within the wider area are circled blue. The proposed site (subject of this appeal) is indicated by a green marker (1).



#### 4.0 Sequential Approach to Site Selection

- 4.1 Upon identifying the requirement to provide the target area (cell) with new 5G coverage, the Appellant adopted the sequential approach as outlined in the Scottish Planning Policy, specifically Planning Advice Note 62 (PAN62). Firstly, consideration was given to sharing any existing telecommunication structures in the immediate area, the utilisation of any suitable existing structures or buildings and finally, the identification of suitable locations for a free-standing (ground-based) installation.

The sequential approach is outlined below:

- a) Mast and site sharing
  - b) Existing building or structure
  - c) Ground based installation
- 4.2 A desktop survey was initially completed before a physical inspection of the area. During this process, no mast/site sharing opportunities or suitable buildings/structures were identified. Please note, many of the buildings are too low and have design constraints (e.g. pitched roofs) making them unsuitable to support the necessary telecommunications equipment. Therefore, a new ground-based installation has been sought.

Owing to the constraints of the search area and general makeup of the locality which includes many low-rise and residential properties, a simple free-standing telecommunications pole with associated ground-based cabinets was considered to be the most appropriate solution and in the right location, would balance the operational requirements of CK Hutchison Networks (UK) Ltd 'Three' and impact upon the surrounding area.

During the search for suitable locations, a number of limiting factors were identified including narrow pavements (insufficient space to implement the required pole and cabinets), the presence of residential driveways (dropped kerbs upon sections of the pavement, further restricting pavement space), underground services (which would prevent the necessary foundations from being deployed) and restrictions on visibility splays.

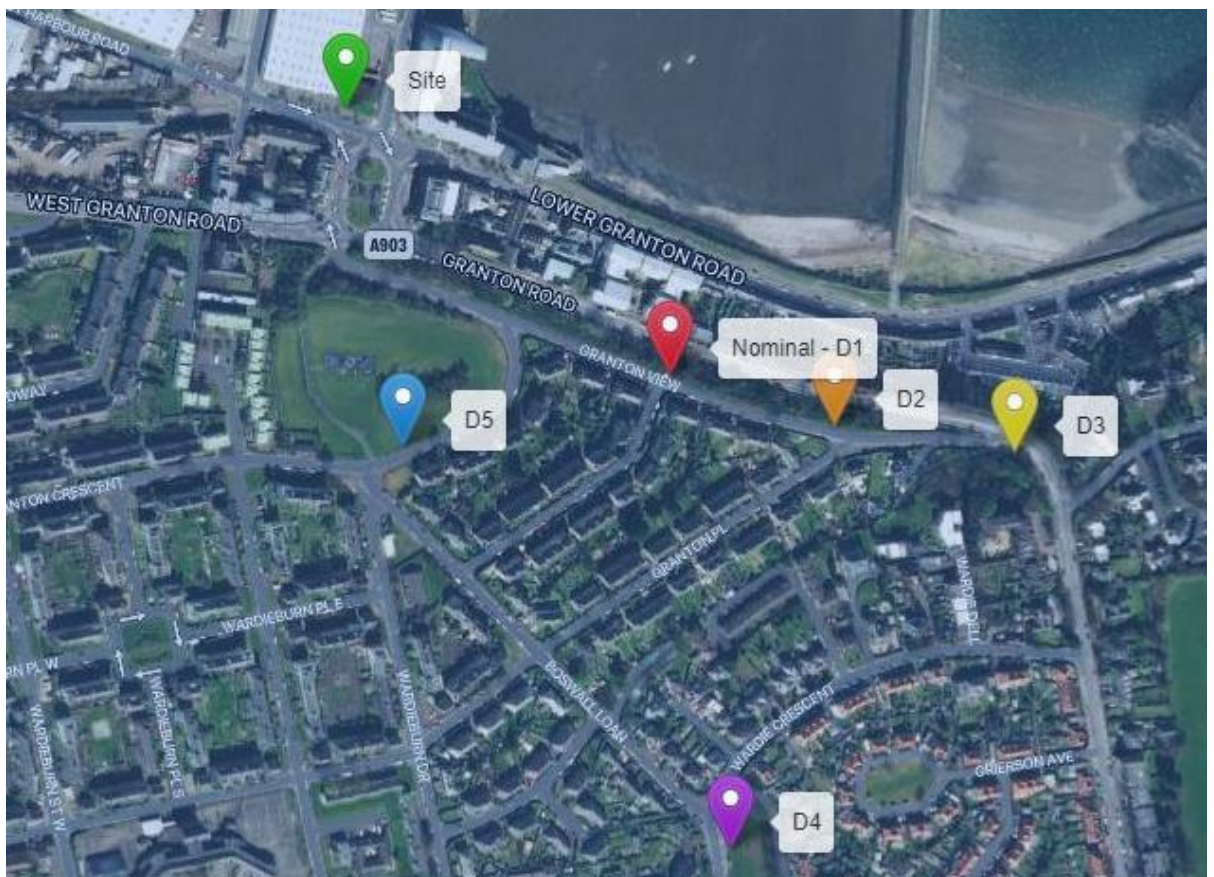
- 4.3 The proposed site (appeal site) is positioned upon a particularly wide section of footpath that sits between the roadway and a pedestrian footway, within proximity of existing street furniture. The location forms the basis of this appeal.

Please refer to Drawing No. EDC16648\_Planning\_Rev A (Title = 215 Proposed Site Plan), for further details.

4.4 A map of the intended target/search area is included in Figure 2, along with the location of sites that were discounted. The application site (appeal site) is also indicated. The ‘Site Specific Supplementary Information and Planning Justification Statement’ prepared by Dot Surveying (Appendix 2) and which formed part of the application for planning, also included details of the other sites which were reviewed and subsequently discounted.

**Figure 2** – Map showing the intended target/search area which has a 100 metre radius. The location of the appeal site is shown as a green tab. The discounted locations are numbered (1 – 5).

Site	NGR	Discounted Reason
D1 – Granton View	323909 , 676961	Discounted option due to pavement width restrictions, proximity to residential housing and an electrical substation.
D2 – Granton View	324025 , 676922	Discounted option due to pavement width restrictions and proximity to residential housing.
D3 – Granton Road	324152 , 676901	Discounted option due to pavement width restrictions and visibility splay concerns.
D4 – Grierson Road	323946 , 676626	Discounted option due to pavement width restrictions and proximity to residential housing.
D5 – Granton Crescent	323719 , 676913	Discounted option due to pavement width restrictions and proximity to residential housing.



## 5.0 The Proposed Scheme & Planning Application

- 5.1 After identifying the site, a detailed survey was undertaken with the aim of producing a set of plans/drawings. The survey considered an array of items including the site characteristics, visual impact upon the immediate and wider area, impact to pedestrians/road users and the operational requirements of CK Hutchison Networks (UK) Ltd 'Three'. Taking all matters into account, a streetworks pole with cabinets was considered to be an appropriate solution. Firstly, the pole and cabinets are designed to be installed along public roads and are often found in such urban locations. Secondly, the site is positioned upon a substantial footpath, thus ensuring there is no loss of pavement space for pedestrians and within close proximity of existing lamp posts, providing the telecommunications pole with vertical emphasis, while achieving the operational objectives to bring much needed coverage to the surrounding area. A detailed set of drawings were produced and included a 20-metre-high telecommunications pole with 3no. cabinets.
- 5.2 Pre-consultation was subsequently undertaken with the City of Edinburgh Council on the 20<sup>th</sup> November 2021, where the drawings were e-mailed to the Local Authority for consideration. A site detail sheet was included in the communication to explain the requirement for a new base station within the local area, including a brief outline of other locations that had been discounted. The highways department and local councillors were also included in the communication. To the best of my knowledge, no formal response was received.
- 5.3 An application for full planning permission was subsequently lodged on the 29<sup>th</sup> November 2021 (application reference: 21/06399/FUL). The application was later refused on the 24<sup>th</sup> February 2022 for the following reasons:-
- “1. The proposal is contrary to Scottish Planning Policy (SPP) 269-291 as it would have a detrimental impact on the Council's ability to facilitate travel by public transport.*
- 2. The proposal is contrary to policy Tra 7 of the adopted Edinburgh Local Development Plan as it would prejudice the implementation of a public transport proposal.*
- 3. The proposal is contrary to policy Tra 9 of the adopted Edinburgh Local Development Plan as it would be detrimental to a path which forms part of the core paths network.”*
- 5.4 It is his application for a 20-metre-high telecommunications installation and associated equipment which forms the basis of the appeal.



## 6.0 Planning Policy and Other Material Considerations

6.1 In proceeding with the proposal, the overall scheme has been assessed against both national and local planning policies.

### National Planning Policy Framework

6.2 The Scottish Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The Scottish Planning Policy sets out the Government's planning policies for Scotland and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

6.3 The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building a strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

6.4 The Scottish Planning Policy 'SPP' and National Planning Framework 'NPF3' contain at their core, a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. In addition, both the SPP and NPF3 recognise the vital importance of high-quality telecommunications and outline the Government's support for high quality communications. The paragraph extracts (highlighted below), clearly outline the overarching support from the Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

*"Outcome 1: A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places."*

*"14. NPF3 aims to strengthen the role of our city regions and towns, create more vibrant rural places, and realise the opportunities for sustainable growth and innovation in our coastal and island areas."*

*“15. The SPP sets out how this should be delivered on the ground. By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Planning therefore has an important role in promoting strong, resilient and inclusive communities. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.”*

*“This SPP introduces a presumption in favour of development that contributes to sustainable development.”*

*“29. This means that policies and decisions should be guided by the following principles;*

- giving due weight to net economic benefit;*
- responding to economic issues, challenges and opportunities, as outlined in local economic strategies;*
- supporting good design and the six qualities of successful places;*
- supporting delivery of infrastructure, for example transport, education, energy, digital and water”*

Paragraph 292 of the SPP, details how it will Support Digital Connectivity. NPF highlights the importance of digital infrastructure, across towns and cities, and in particular Scotland’s more remote and island areas. Scotland’s economy and social networks depend heavily on high-quality infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across the country.

*“292. NPF3 highlights the importance of our digital infrastructure, across towns and cities, and in particular our more remote rural and island areas. Our 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.”*

*“293. The planning system should support:*

- Development which helps deliver the Scottish Governments 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.”*

### **Development Planning**

*“294. Local development plans should reflect the infrastructure roll-out plans of digital communications operators, community groups and others, such as the Scottish Government, the UK Government and local authorities.”*

*“295. 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.”*

*“296. 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 combination with existing equipment in the area;*
- *details of the design, including height, materials and all components of the proposal;*
- *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<sup>131</sup>; and*
- *an assessment of visual impact, if relevant.”*

*297. Policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development. This should be done in consultation with service providers so that appropriate, universal and futureproofed infrastructure is installed and utilised.*

### **Development Management**

*“298. 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 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.”*

*“299. 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 effects of equipment should be taken into account.”*

*“300. 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.”*

6.5 In refusing permission, the City of Edinburgh Council have referenced the following policies:-

#### Local Development Plan

- Policy Tra 7 Public Transport Proposals and Safeguards
- Policy Tra 9 Cycle and Footpath Network

## 7.0 Support for the Development

### 7.1 Need

As detailed above, CK Hutchison Networks (UK) Ltd 'Three' has identified a need to provide new 5G network coverage in and around West Harbour Road, within the vicinity of Lochinvar Drive.

Notwithstanding national planning guidance, the proposed site will assist with the Scottish Government's objectives of ensuring people across Scotland have access to 5G as outlined within a recent publication 'Forging Our Digital Future with 5G – A Strategy for Scotland' (published August 2019), which recognises the large social, economic and environmental benefits of modern, high-speed and efficient communications. An extract from this publication is included below:-

#### Forging our Digital Future with 5G: A Strategy for Scotland

*"The technological revolution will be a significant opportunity for Scotland over the coming years. The rollout of 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 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."*

*"5G is so much more than an upgrade of previous generations of mobile connectivity. It will enable new or enhanced connectivity in the fields of transport, artificial intelligence (AI), robotics and remote monitoring – the opportunities are endless. This enhanced connectivity will make us more productive and efficient as a country and play a vital role in the transition to a zero-carbon economy and tackling the climate emergency, e.g. through reduced emissions."*

*"5G will be transformational for businesses, public services and for individual citizens. It is suggested that enhanced 5G capability could reduce business start-up costs, stimulate exports and increase the use of cost-reducing technologies such as cloud computing. It could provide easier access to healthcare, education and online shopping for people, wherever they live in the country."*

*"It is estimated that by enhancing 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, 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 5G.”*

*“However, telecommunications in the UK is reserved to the UK Government and mobile network rollout is commercially led. We continue to press the UK Government to give us the powers and resources which would allow us to reap the significant benefits that we could see from enhanced 5G provision in Scotland. We cannot wait any longer, which is why we are driving ahead and setting out what action we, with the powers and resources we do have, can take to enhance digital connectivity. The Scottish Government is determined that Scotland will not be left behind. Indeed, we will continue to work with industry, the regulator and others in the public sector to make sure we are at the forefront of this revolution.”*

*“In this strategy we set out our commitment and steps to embracing the possibilities of 5G and ensuring that Scotland is able to seize the prize and become a 5G leader and a forward-looking digital nation.”*

A full copy of this document is included in Appendix 5.

The proposed site on West Harbour Road is critical to ensuring that CK Hutchison Networks (UK) Ltd ‘Three’ meet their operational requirements and by filling a gap in 5G coverage, will significantly improve communications within the local area.

### **7.3 The Site**

The location is set upon an area of adopted public highway (footpath) along West Harbour Road which connects with Lochinvar Drive. The site is positioned on a wide area of footpath. A full illustration of the site is included within the location plan and drawings which formed part of the application. An extract of the drawings is included in Figure 6 (below).

### **7.4 The Location and Design**

The target area is centred around West Harbour Road, near to Lochinvar Drive. Due to the limitations of 5G and to achieve operational requirements, the telecommunications site must be situated within close proximity of the target area itself. As shall be explored in more detail below, significant care has been taken in selecting the site, thus minimising any impact upon the surrounding area.

As covered within section 4 of this document and before the site (appeal site) was identified, a sequential approach to site selection was adopted. In the absence of shareable installations (e.g. masts) or indeed suitable buildings/structures, a new ground-based installation has been sought. Section 3 of the Site-Specific Supplementary Information and Planning Justification Statement ‘Planning

Statement' advised that existing base stations were not capable of supporting additional equipment which could extend coverage across the target area (West Harbour Road and Lochinvar Drive). Furthermore, section 6 of the Planning Statement referred to the sequential approach to site selection that was followed. A copy of the Planning Statement is included in Appendix 2.

While the exact location of operational base stations within the surrounding area were not included in the planning application itself, the pre-application correspondence (Appendix 1) contained a radio plot to illustrate the requirement for 5G coverage around the target area. Further information is included in section 3 of this particular document. As detailed, the nearest operational site is approximately 1km away, a distance too great in terms of supplying coverage in and around West Harbour Road and Lochinvar Drive.

In the absence of shareable structures or adequate buildings (note, buildings within the surrounding area are typically formed of 1-3 storeys and buildings of an industrial nature that are considered too low/unsuitable to support the necessary telecommunications equipment), a new ground-based installation is the only viable solution which will achieve the operational requirements of CK Hutchison Networks (UK) Ltd 'Three'.

The proposed scheme will occupy a footprint of approximately 4 square metres and consist of a single 20 metre high H3G Phase 8 street pole with built-in wrap-around cabinet along with 3no. additional equipment cabinets. The apparatus, which is intended to be installed upon grass verges and pavements where limited opportunities exist, will be discreetly positioned within proximity of many tall lampposts that sit adjacent to the roundabout. Please note, the pole is designed to fit within typical street furniture including lamp posts and the cabinets are typical of control boxes commonly found along the public highway.

While it is appreciated the telecommunications pole will be larger in comparison to the surrounding street furniture, the structure plays an important function in terms of supporting the necessary telecommunications equipment. Furthermore, the radio antennas (housed within the pole) will transmit and receive radio signals to and from mobile handsets and other wireless devices. To operate efficiently, the radio antennas must be clear of obstructions such as buildings and trees, which is why the pole stands slightly above the surrounding features. Nevertheless, every effort has been made to keep the height of the installation to an absolute minimum, balancing visual impact with the operational requirements of CK Hutchison Networks (UK) Ltd 'Three'. Nevertheless, despite the added height, we consider the surrounding features including lampposts, buildings and trees, will provide the equipment with visual context.

Due to the reasons above, the constraints of 5G and given the nature of the surrounding area, a free-standing pole with a small number of ground-based cabinets

is deemed the most appropriate solution for this urban location as opposed to a conventional ground-based mast, which will be typically larger and more visually prominent.

**Figure 3** – Extract from Google Streetview.





Figure 4 – Extract from Google Streetview.



Figure 5 – Extract from Google Streetview.

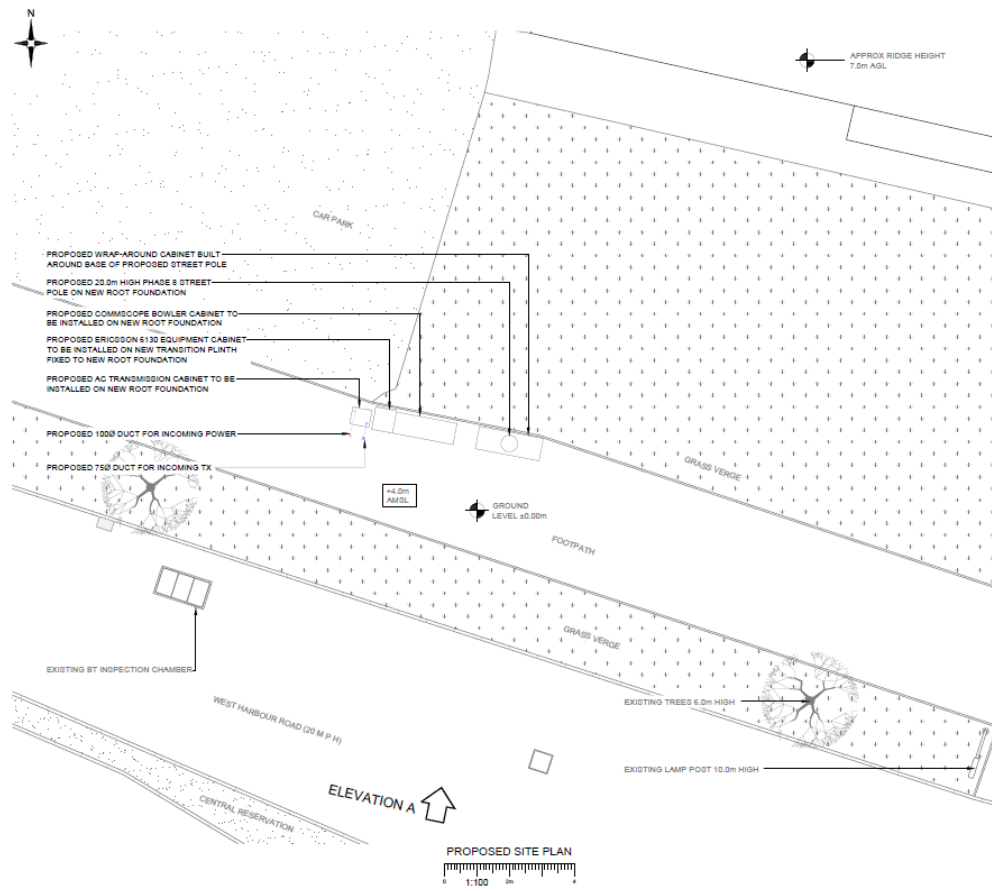


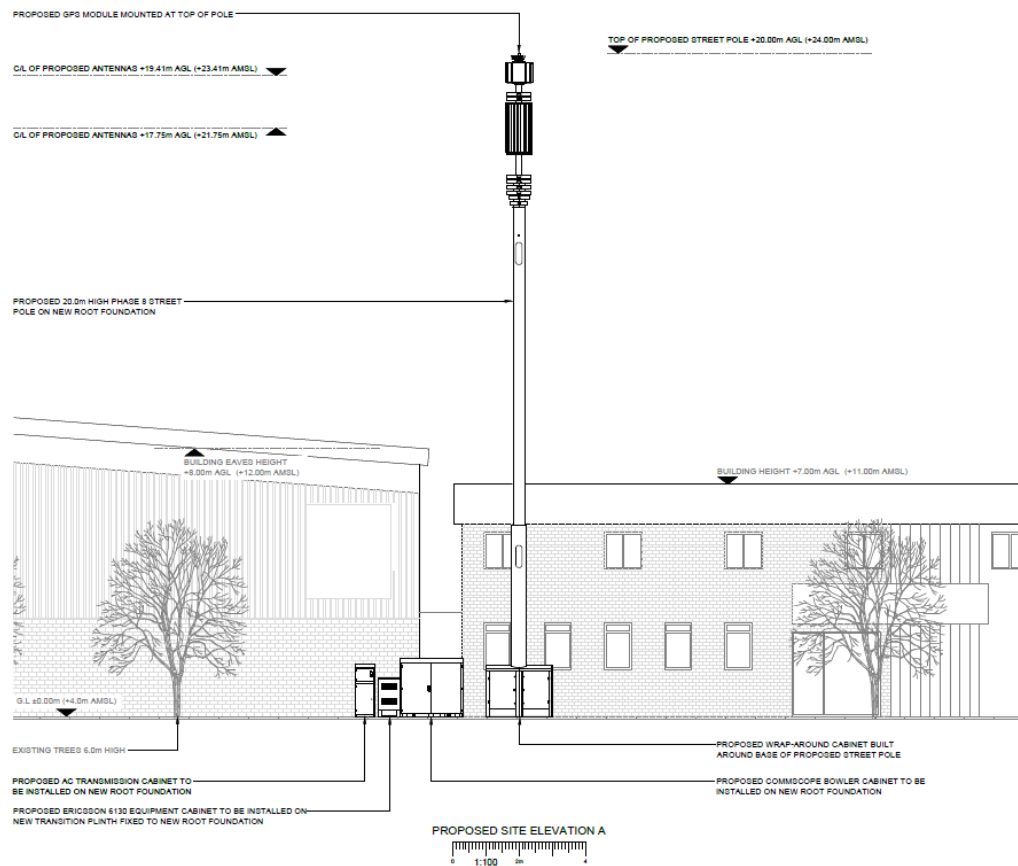
While there may be few trees immediately adjacent to the site, there are trees in the wider area and in terms of visual impact, the site is positioned upon a wide footpath, while the pole and cabinets are designed to fit within the street scene and are ideal for providing mobile coverage in such urban locations. The site itself will occupy a very small footprint and due to the minor scale of the scheme, we do not consider the development will have a significant visual impact upon the surroundings or lead to significant clutter upon the road verge. To ensure a uniform appearance, the pole and cabinets will be positioned in a single line. The site has also been strategically positioned to ensure it is not within the immediate frontage of any residential properties. Note, the surrounding properties are set back from the roundabout.

To accord with the grassland to the rear of the site, trees within the wider area and to assist with assimilation of what is recognised as a 'functional', but essential telecoms infrastructure, the proposed monopole and cabinets will be coloured grey (RAL-7035). Please note and if necessary, the pole and cabinets may be painted to the requirements of the City of Edinburgh Council.

Finally, and in addition to the above, deploying the equipment upon the footpath and will ensure the free flowing movement of pedestrians ( not impacting pedestrians) and other relative users of this footpath at this location.

Figure 6 – Extract of the proposed scheme.





## 7.6 Further Information

7.7 Due to the nature of the proposed scheme, the location and taking into consideration the operational requirements of CK Hutchison Networks (UK) Ltd 'Three', we do not consider that a 20 metre high pole is dominant or out of scale and on balance, we do not consider the development will have a demonstrably negative impact upon the 'visual amenities' of the street scene, the wider area or adjacent grassland.

7.7 In applying for planning permission, it is considered the Appellant has done so in accordance with National and Local Planning Policies.

- 1) Justification for a new site and the operational requirements to bring much needed 5G network coverage to the area in and around West Harbour Road. The site will provide residents, workers and visitors with a choice of high-quality communications, an objective which OFCOM and the Scottish Government are keen to achieve;
- 2) The adoption of a sequential approach to site selection which involved the completion of a desktop survey and physical search of the intended target/search area to identify suitable locations(s) that minimise impact to the immediate and wider area, including the possibility of sharing existing telecommunications infrastructure;
- 3) In the absence of shareable structures including telecommunications sites, the use of a simplistic design which includes a free-standing telecommunications pole and associated cabinets;

- 4) The use of existing characteristics including a wide verge and positioning of the proposed equipment within proximity of existing lampposts, reducing impact to pedestrians and visual impact upon the immediate and wider area;
- 5) The detailing of other sites that were considered and discounted, which were included with the application for prior approval. Further details are also included within this appeal statement;
- 6) The inclusion of an ICNIRP certificate within the application for prior approval.

## 8.0 Conclusion

- 8.1 As detailed within the application for Prior Approval and this subsequent Planning Appeal Statement of Case, there is an identified a need to improve the existing telecommunications network within the local area by supplying new 5G (Fifth Generation) mobile coverage. Telecommunications has become an integral part of society and the proposed scheme will bring a modern, high-speed communications service to the local area where many people reside and where there is an increased demand for 5G, particularly given the requirements to work from home during the pandemic.
- 8.2 Due to the high frequency and low power output of such installations, the cell areas are generally very constrained. Please note, existing telecommunications sites, structures and buildings, which could potentially accommodate the necessary equipment, were not identified. Consequently, a street works installation is the only feasible solution.
- 8.3 While the Appellant appreciates there may be a degree of visual impact from the erection of a new ground-based installation, the proposed apparatus has been carefully positioned upon a spacious footpath and alongside existing street furniture, namely lampposts to help with assimilation and has been strategically positioned to ensure it is not within the immediate outlook of residential properties. Furthermore, the installation itself (pole and cabinets) is designed to be deployed upon pavements and verges in such urban locations. In terms of the discreet location and nature of the scheme proposed, it is considered the apparatus will blend into the existing street scene and the overall proposal represents an appropriate balance between visual impact and operational requirements. At 20 metres, the pole is at the absolute minimum height which can be deployed. In addition, the pole and cabinets are to be coloured green to blend in with the adjacent parcel of grassland and trees within the wider area.
- 8.4 The positioning of the equipment upon the footpath will ensure there is minimal impact to pedestrians.
- 8.5 The proposed site will provide the local area with a modern, high-quality communications network and will assist with the Scottish Government's objectives of ensuring people across Scotland have access to 5G.
- 8.6 Following the refusal of planning permission to implement a new telecommunications installation, due to the operational requirements of CK Hutchison Networks (UK) Ltd 'Three' and the importance of telecommunications in general, we would appreciate if the review body can give due consideration to the proposed scheme and allow this appeal.

Dot Surveying Ltd.  
FAO: Tom Gallivan  
14 Inverleith Place  
Edinburgh  
EH3 5PZ

CK Hutchison Networks (UK) Ltd.  
Great Bingham's Mead  
Vastern Road  
Reading  
RG1 8DJ

**Decision date: 24 February 2022**

TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS  
**DEVELOPMENT MANAGEMENT PROCEDURE (SCOTLAND) REGULATIONS 2013**

A new 20m high 'slim line' streetpole with built-in cabinet and 3 No. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area.

At Proposed Telecoms Apparatus 43 Metres Northeast Of 1A West Harbour Road  
Edinburgh

**Application No:** 21/06399/FUL

**DECISION NOTICE**

With reference to your application for Planning Permission registered on 6 December 2021, this has been decided by **Local Delegated Decision**. The Council in exercise of its powers under the Town and Country Planning (Scotland) Acts and regulations, now determines the application as **Refused** in accordance with the particulars given in the application.

Any condition(s) attached to this consent, with reasons for imposing them, or reasons for refusal, are shown below;

**Conditions:-**

**Reason for Refusal:-**

1. The proposal is contrary to Scottish Planning Policy (SPP) 269-291 as it would have a detrimental impact on the Council's ability to facilitate travel by public transport.
2. The proposal is contrary to policy Tra 7 of the adopted Edinburgh Local Development Plan as it would prejudice the implementation of a public transport proposal.

3. The proposal is contrary to policy Tra 9 of the adopted Edinburgh Local Development Plan as it would be detrimental to a path which forms part of the core paths network.

Please see the guidance notes on our [decision page](#) for further information, including how to appeal or review your decision.

Drawings 01 - 07, represent the determined scheme. Full details of the application can be found on the [Planning and Building Standards Online Services](#)

The reason why the Council made this decision is as follows:

The proposal will not have an adverse visual impact on the character of the surrounding area or the setting of listed buildings. However, the proposal would prejudice the implementation of an identified public transport safeguard and would be detrimental to a path which forms part of the core path network. The proposal is contrary to the relevant policies within the adopted Edinburgh Local Development Plan and Scottish Planning Policy, paragraphs 269-291.

This determination does not carry with it any necessary consent or approval for the proposed development under other statutory enactments.

Should you have a specific enquiry regarding this decision please contact James Allanson directly at [james.allanson@edinburgh.gov.uk](mailto:james.allanson@edinburgh.gov.uk).



**Chief Planning Officer**  
**PLACE**  
**The City of Edinburgh Council**



## NOTES

1. If the applicant is aggrieved by the decision to refuse permission for or approval required by a condition in respect of the proposed development, or to grant permission or approval subject to conditions, the applicant may require the planning authority to review the case under section 43A of the Town and Country Planning (Scotland) Act 1997 within three months beginning with the date of this notice. The Notice of Review can be made online at [www.eplanning.scot](http://www.eplanning.scot) or forms can be downloaded from that website. Paper forms should be addressed to the City of Edinburgh Planning Local Review Body, G.2, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG. For enquiries about the Local Review Body, please email [localreviewbody@edinburgh.gov.uk](mailto:localreviewbody@edinburgh.gov.uk).

2. If permission to develop land is refused or granted subject to conditions and the owner of the land claims that the land has become incapable of reasonably beneficial use in its existing state and cannot be rendered capable of reasonably beneficial use by carrying out of any development which has been or would be permitted, the owner of the land may serve on the planning authority a purchase notice requiring the purchase of the owner of the land's interest in the land accordance with Part 5 of the Town and Country Planning (Scotland) Act 1997.

## **Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines**

Three UK Limited  
Star House  
20 Grenfell Road  
Maidenhead

Declares that the proposed equipment and installation as detailed in the attached planning / General Permitted Development Order application at:

(Site Address)  
GRANTON ROAD  
GRANTON  
EDINBURGH  
LOTHIAN  
EH5 1AB

is designed to be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection<sup>1</sup> as expressed in EU Council Recommendation 1999/519/EC of 12 July 1999 "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

Date: 21.04.21  
Name: GBC  
Position: Design

Great British Communications Ltd  
Lapwing House  
Block 3 Forward Point  
Tan House Lane  
Widnes  
Cheshire  
WA8 0SL

---

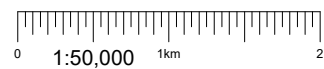
<sup>1</sup> The updated ICNIRP Guidelines published in March 2020 are covered by this declaration

SITE LOCATION



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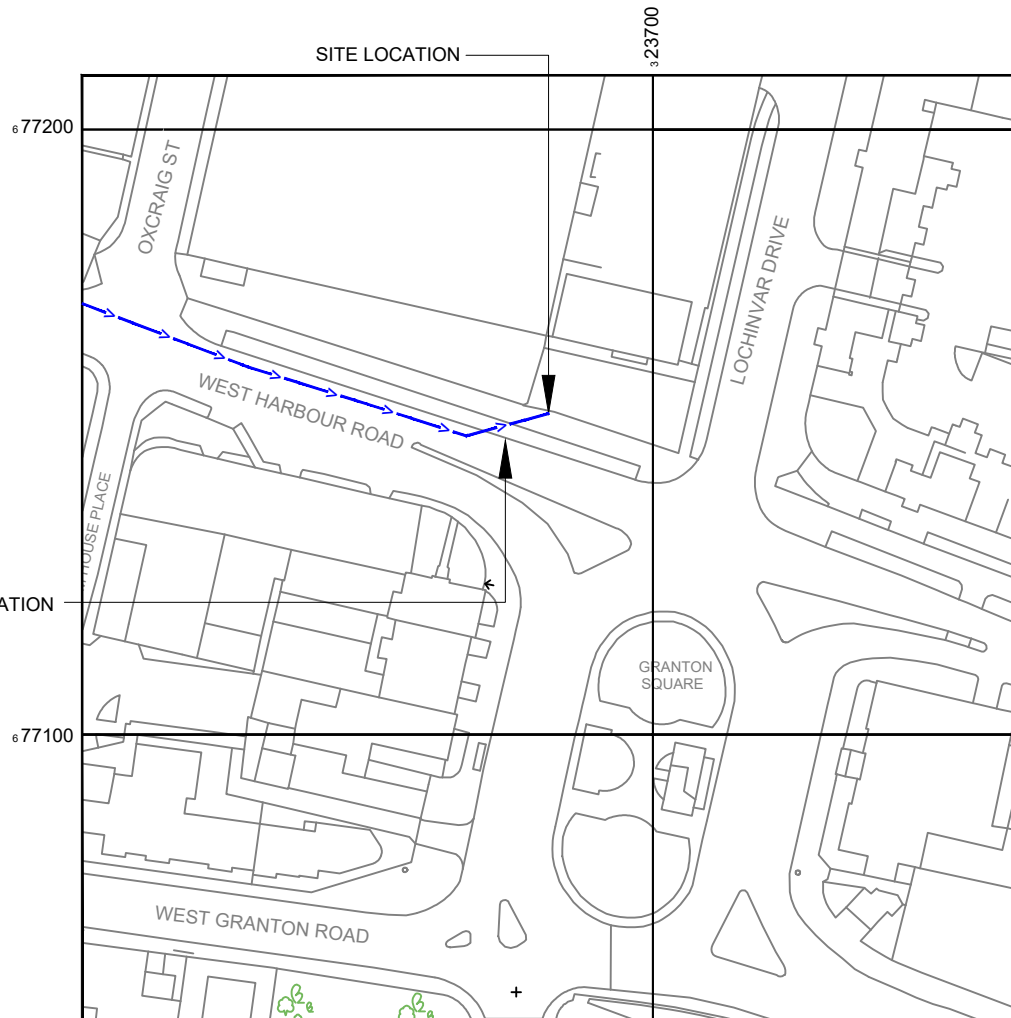
SITE AREA PLAN



SITE PHOTOGRAPH



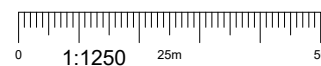
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NGR E: 323683 N: 677153

SITE LOCATION PLAN



GOOGLE MAPS QR CODE

GOOGLE MAPS - <https://goo.gl/maps/LEt1qmJB8d5sMsWW8>

STREETVIEW - <https://goo.gl/maps/gxsnn8GADo3uNGyZ6>

NOTES:

- ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

Access Route To Site:



REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
[www.gbcservices.co.uk](http://www.gbcservices.co.uk)

Site Name: WEST HARBOUR ROAD SW

3UK Nominal ID: EDC16648

Address: WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title: 002 SITE LOCATION PLAN

Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
EDC412/81993/EH0737

Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A Issue: A

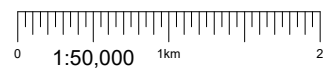
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SITE LOCATION



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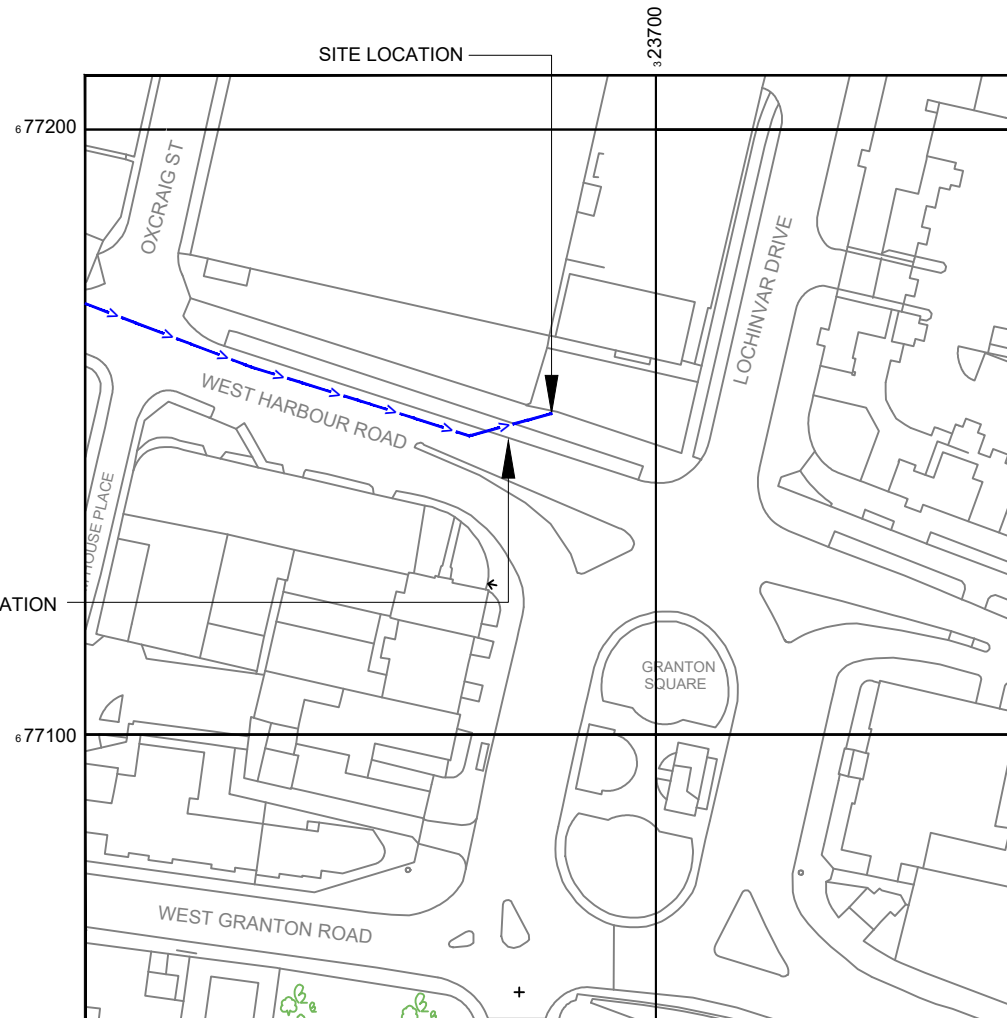
SITE AREA PLAN



SITE PHOTOGRAPH



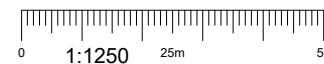
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GOOGLE MAPS QR CODE

GOOGLE MAPS - <https://goo.gl/maps/LEt1qmJB8d5sMsWW8>

STREETVIEW - <https://goo.gl/maps/gxsnn8GADo3uNGyZ6>

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Access Route To Site:



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A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
[www.gbcservices.co.uk](http://www.gbcservices.co.uk)

Site Name: WEST HARBOUR ROAD SW

3UK Nominal ID: EDC16648

Address: WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title: 002 SITE LOCATION PLAN

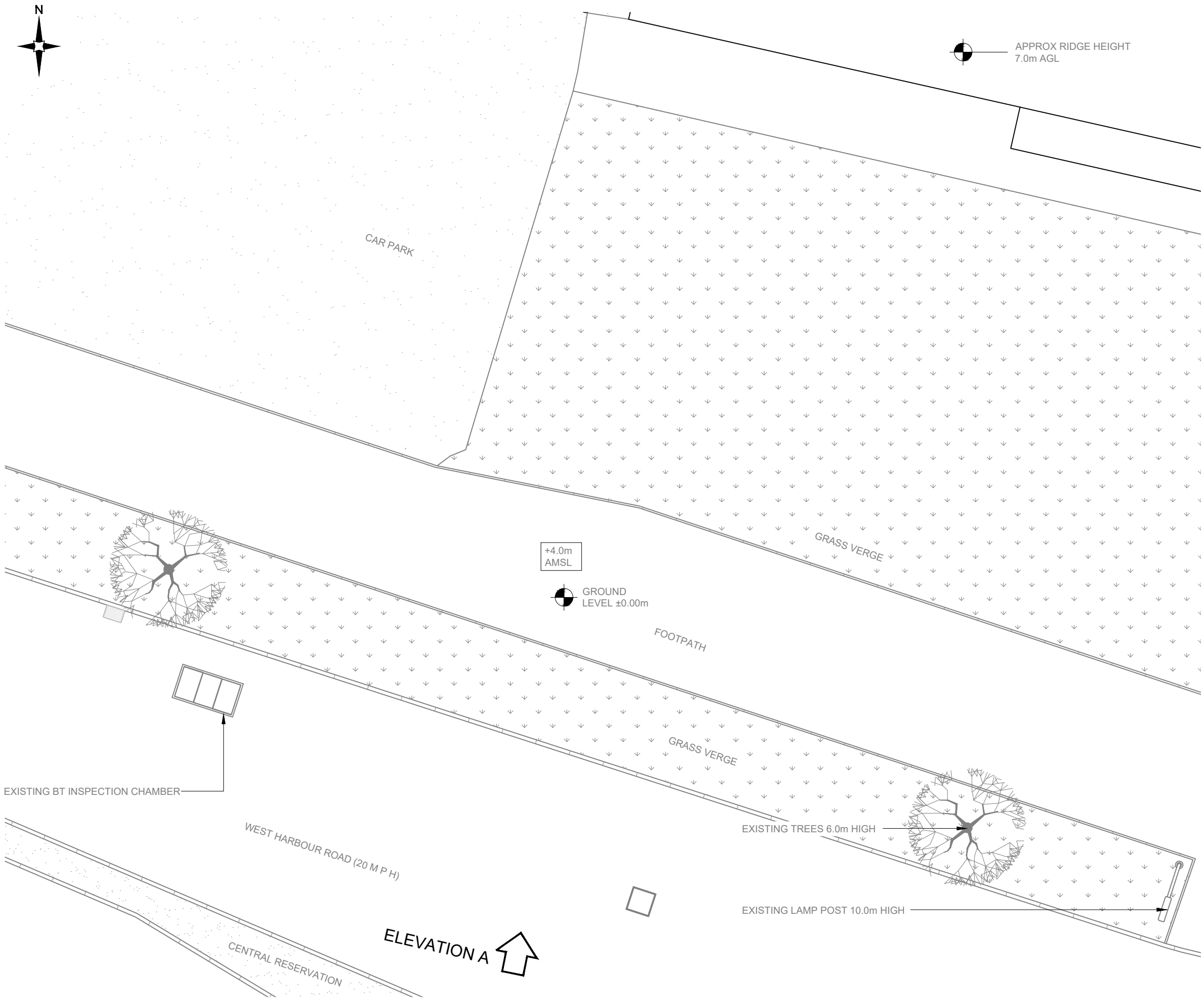
Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
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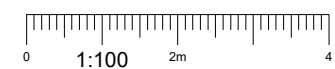
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ELEVATION A

EXISTING SITE PLAN



NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE**

Title: **100 EXISTING SITE PLAN**

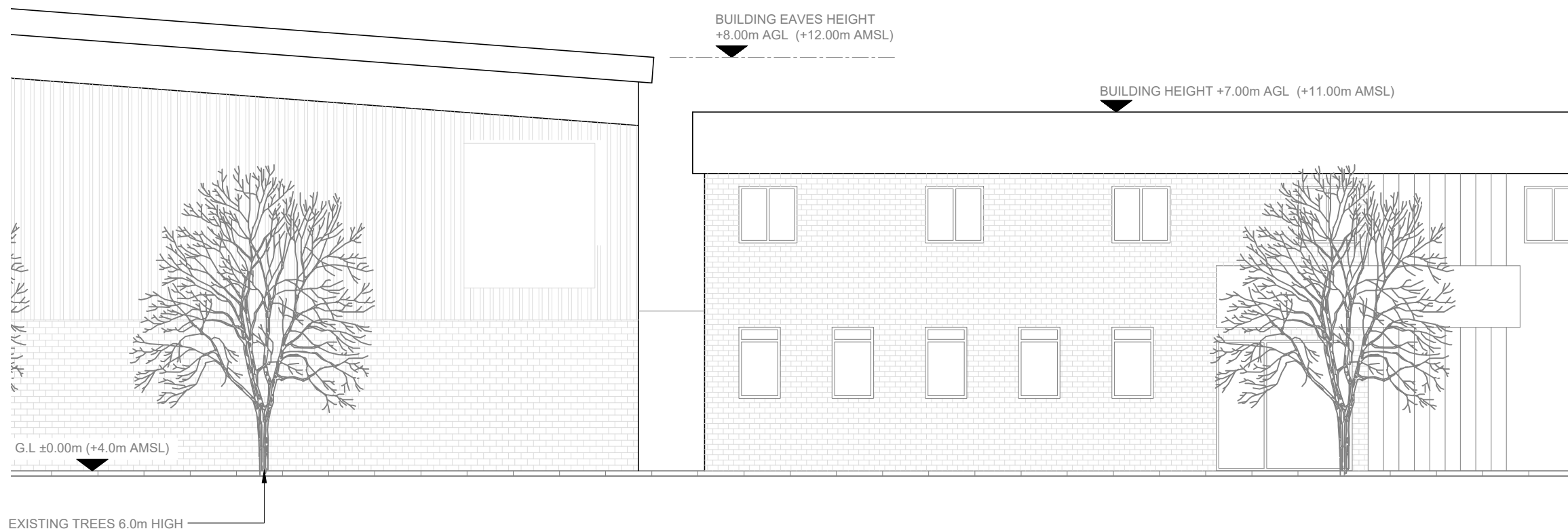
Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

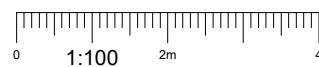
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**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

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EXISTING ELEVATION A



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison  
Networks (UK)  
Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
Lapping House, Block 3 Forward Point,  
Tan House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name:

WEST HARBOUR ROAD SW

3UK Nominal ID:

EDC16648

Address:

WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE

Title:

150 EXISTING SITE ELEVATION

Project:

UNILATERAL SW

Purpose of Issue:

PLANNING

MBNL/TM/H3G Cell ID:

EDC412/81993/EH0737

Drawing No:

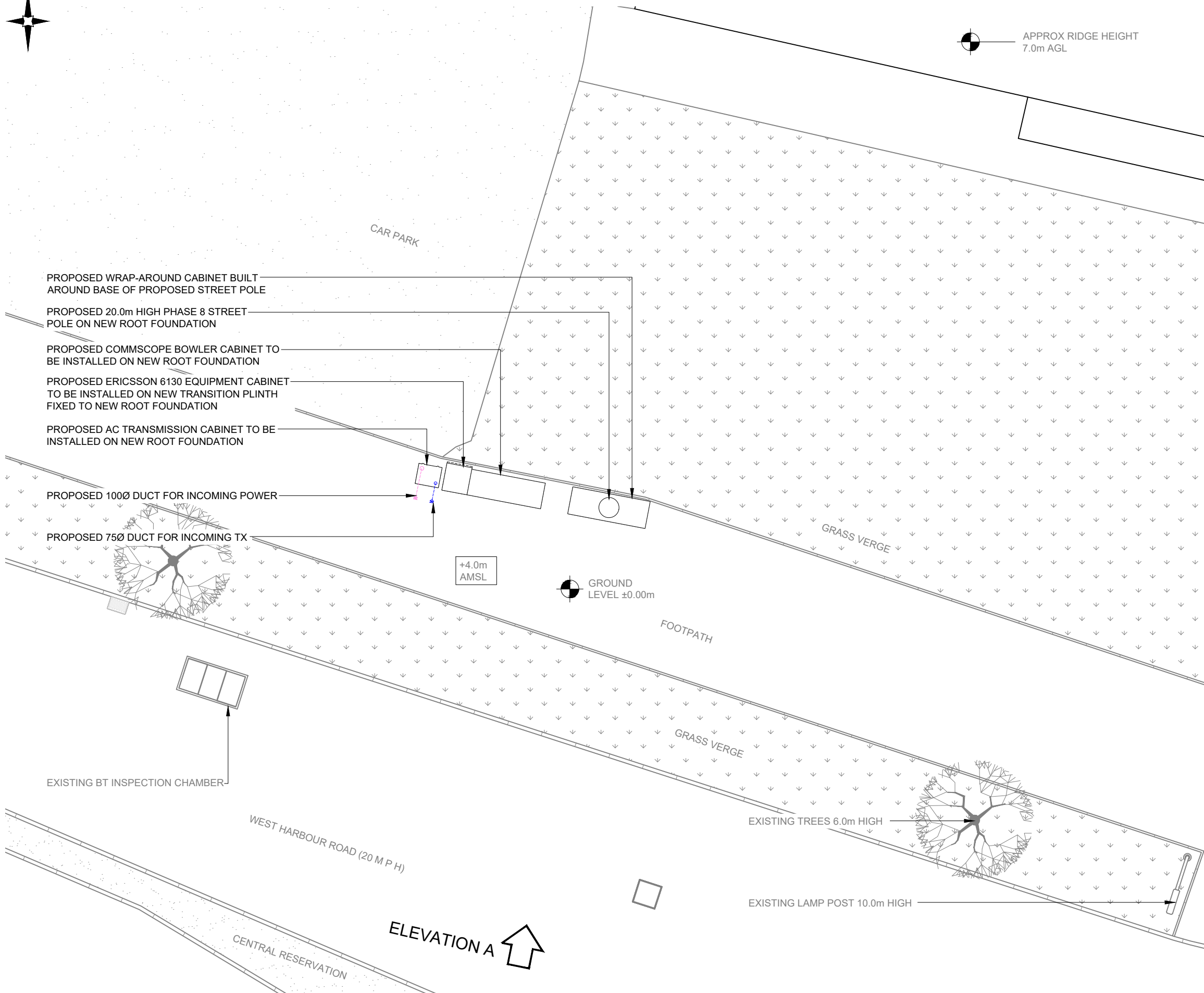
EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

Issue:

A



APPROX RIDGE HEIGHT  
7.0m AGL



PROPOSED SITE PLAN  
1:100

NOTES:  
1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison Networks (UK) Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:  
**GBC**  
Great British Communications  
Lapping House, Block 3 Forward Point,  
Ton House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD GRANTON EDINBURGH EH5 1HE**

Title: **215 PROPOSED SITE PLAN**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
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PROPOSED GPS MODULE MOUNTED AT TOP OF POLE

C/L OF PROPOSED ANTENNAS +19.41m AGL (+23.41m AMSL)

C/L OF PROPOSED ANTENNAS +17.75m AGL (+21.75m AMSL)

TOP OF PROPOSED STREET POLE +20.00m AGL (+24.00m AMSL)

PROPOSED 20.0m HIGH PHASE 8 STREET POLE ON NEW ROOT FOUNDATION

BUILDING EAVES HEIGHT +8.00m AGL (+12.00m AMSL)

BUILDING HEIGHT +7.00m AGL (+11.00m AMSL)

G.L ±0.00m (+4.0m AMSL)

EXISTING TREES 6.0m HIGH

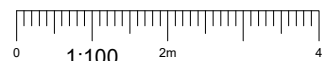
PROPOSED AC TRANSMISSION CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED ERICSSON 6130 EQUIPMENT CABINET TO BE INSTALLED ON NEW TRANSITION PLINTH FIXED TO NEW ROOT FOUNDATION

PROPOSED WRAP-AROUND CABINET BUILT AROUND BASE OF PROPOSED STREET POLE

PROPOSED COMMSCOPE BOWLER CABINET TO BE INSTALLED ON NEW ROOT FOUNDATION

PROPOSED SITE ELEVATION A



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:



Great British Communications  
 Lapping House, Block 3 Forward Point,  
 Tan House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name: WEST HARBOUR ROAD SW

3UK Nominal ID: EDC16648

Address: WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE

Title: 265 PROPOSED SITE ELEVATION

Project: UNILATERAL SW

Purpose of Issue: PLANNING

MBNL/TM/H3G Cell ID:  
 EDC412/81993/EH0737

Drawing No: EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A

Issue: A

100mm

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### PROPOSED ANTENNA & RF EQUIPMENT SCHEDULE

EXISTING/PROPOSED	ANTENNA REFERENCE	FUNCTION	FEEDER/FIBRE						BIAS T's/RRU's		ANTENNAS									
			LENGTH(m) & DIAMETER (SEE GUIDANCE NOTES BELOW)			TYPE (COAX OR FIBRE)	FEEDERS QTY	FIBRE QTY	FIBRE LENGTH	FILTER	DIPLEXER	BIAS T	RRU QTY <small>(HL= HIGH LEVEL, E= ENCLOSURE)</small>	ANT. REF.	ANTENNA MANUFACTURERS PART No.	BRG°	HEIGHT TO TOP (m)	HEIGHT TO C/L (m)	HEIGHT TO U/S (m)	LOCATION (POLE MOUNTED, HEADFRAME, WITHIN SHROUD ETC)
			MF1	MF(J1)	TOTAL															
SECTOR 1 PROPOSED	A1	5G	-	-	-	DC FIBRE	-	3	24m	-	-	-	-	A1a	AIR 3278	320°	19.72	19.41	19.10	UPPER HEADFRAME
	A2	800	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	-	-	-	E	HUA AHP4517R12v06	320°	18.50	17.75	17.00	LOWER HEADFRAME	
		1400	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	1	-	-	E							
		1800 /2100	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	-	-	1	E							
		-	-	-	-	-	-	-	-	-	-	-	-							E
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-	-	-	-	-	-	-	-	-	-	-	-	E								
SECTOR 2 PROPOSED	B1	5G	-	-	-	DC FIBRE	-	3	24m	-	-	-	-	B1a	AIR 3278	120°	19.72	19.41	19.10	UPPER HEADFRAME
	B2	800	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	-	-	-	E	HUA AHP4517R12v06	120°	18.50	17.75	17.00	LOWER HEADFRAME	
		1400	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	1	-	-	E							
		1800 /2100	1/2"=17	1/2"=7m <sup>(2)</sup>	24m	DC FIBRE+COAX	4	-	-	-	-	1	E							
		-	-	-	-	-	-	-	-	-	-	-	-							E
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-	-	-	-	-	-	-	-	-	-	-	-	E								

#### GPS LINE KEY

SECTOR ID	NODE TYPE	NODE C/L (m) AGL	GPS NODE CABLE LENGTH (m)
1	GPS	20.00m	35m

A	Issued for Planning	IMC	SB	21.10.21
REV	MODIFICATION	BY	CH	DATE

**CK Hutchison  
Networks (UK)  
Limited**  
Great Brighams Mead,  
Vastern Road, Reading,  
Berkshire, England,  
RG1 8DJ

Design Consultant & Principal Contractor:



**Great British Communications**  
Lapping House, Block 3 Forward Point,  
Tan House Lane, Widnes, Cheshire, WAB 0SL  
t. 44 (0)151 420 4128  
www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address: **WEST HARBOUR ROAD  
GRANTON  
EDINBURGH  
EH5 1HE**

Title: **304 PROPOSED CONFIGURATION  
ANTENNA SCHEDULE**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: EDC16648_EDC412_81993_EH0737_GA_REV_A	Issue: A
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100mm  
  
50mm  
  
10mm

### Support Structure Schedule

Structure ID	Status	Equipment Description / Type	Structure Manufacturer	Height AGL (m)	Colour (RAL Colour)	Headframe Details	Foundation / Support Grillage / Host Structure Details	Support Bolt Details	MBNL Ref:	Comments
ST1	PROPOSED	PHASE 8 POLE	HEL/ VALMONT	20.00m	GREY-7035	-	ROOT	-	N/A	WITH WRAPAROUND CABINET

### Equipment Schedule

Equipment ID	Quantity	Status	Equipment Description / Type	Equipment Manufacturer	Dimensions (W x D x H)	Weight (kg)	Colour (RAL Colour)	Material	Location	Power	Power cable length (m)	MBNL Ref:	Comments
CAB1	1	PROPOSED	- AC TRANSMISSION	COMMSCOPE	600x500x1585	110	GREY-7035	STEEL	OUTDOOR	-	-	-	FIBRE ONLY - TX SUPPLIER TBC
CAB2	1	PROPOSED	- 6130	ERICSSON	650x700x950	130	GREY-7035	STEEL	OUTDOOR	-	-	-	COMPLETE WITH TRANSITION PLINTH
CAB3	1	PROPOSED	- BOWLER	COMMSCOPE	1900x600x1752	220	GREY-7035	STEEL	OUTDOOR	-	-	-	

DEPENDENCY	STATUS
RF Compliance	Sector A - Step 2.0 SW Sector B - Step 1.0 SW
Building Regulations Approval	N/A
Asbestos	N/A
Planning Conditions	TBC by Local Authority
Geotech Report	N/A
Structural Calculations	N/A
Intrusive Building Survey	N/A
Global Design Check	N/A
Rigging Survey	N/A
FIXITS	N/A
Power	Proposed 1 phase 100A supply - DNO Quote Approval Required
Transmission Solution	Fibre only
Cooling Solution	Manufacturers Cooling
Line of Site Survey	N/A
Services Search	Completed - 23.09.21
Trial Hole Report	Pending
Other	-

REV	MODIFICATION	BY	CH	DATE
A	Issued for Planning	IMC	SB	21.10.21

**CK Hutchison Networks (UK) Limited**  
 Great Brighams Mead,  
 Vastern Road, Reading,  
 Berkshire, England,  
 RG1 8DJ

Design Consultant & Principal Contractor:  
  
**Great British Communications**  
 Lapping House, Block 3 Forward Point,  
 Tan House Lane, Widnes, Cheshire, WAB 0SL  
 t. 44 (0)151 420 4128  
 www.gbcservices.co.uk

Site Name: **WEST HARBOUR ROAD SW**

3UK Nominal ID: **EDC16648**

Address:  
**WEST HARBOUR ROAD  
 GRANTON  
 EDINBURGH  
 EH5 1HE**

Title: **307 EQUIPMENT SCHEDULES & DEPENDENCIES**

Project: **UNILATERAL SW**

Purpose of Issue: **PLANNING**

MBNL/TM/H3G Cell ID:  
**EDC412/81993/EH0737**

Drawing No: **EDC16648\_EDC412\_81993\_EH0737\_GA\_REV\_A** Issue: **A**

100mm  
50mm  
10mm

**5G SITE SPECIFIC SUPPLEMENTARY INFORMATION AND PLANNING JUSTIFICATION  
STATEMENT PREPARED BY DOT SURVEYING**

1. Site Details

Site Name:	WEST HARBOUR ROADstreet works	Site Address:	WEST HARBOUR ROAD GRANTON EDINBURGHEH5 1HE
NGR:	E: 323683 N: 677153		
Site Ref Number:	EDC16648	Site Type:	In this instance, a new 20m high 'slim line' Streetpole with built-in cabinet and 3no. separate equipment cabinets (colour Grey RAL7035) are to be positioned on a pavement within an industrial area, which should soften any visual impact.

2. Pre-Application Check List

**Site Selection**

Was the Council's mast register used to check for suitable sites by the operator or the LPA?		No
If no explain why:  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 the Local Planning Authority**

Written offer of pre-application consultation:	N/a	
Was there pre-application contact:		Yes
Date of pre-application contact:	20 <sup>th</sup> November 2021	
Name of contact:	Email issue to the Local Planning Department.	

Summary of outcome/Main issues raised:

H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services. In these unprecedented times of the Covid-19 pandemic, it is recognised that high-speed mobile connectivity is the lifeblood of a community; facilitating educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and facilitating the increased need and demand for working from home, as well as enjoying access to social, media and gaming for leisure time activities.

The pre-consultation invited comments within a two-week period and while the merits of high-speed telecommunications are generally recognised; pre-application has identified the need to carefully consider the risk of increased visual amenity to adjoining residential properties through the siting of telecommunications infrastructure within urban settings.

The e-mail communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The information sheet also included other sites that have been investigated and discounted. Further details of the discounted sites are included within this document.

**Ten Commitments Consultation**

Rating of Site under Traffic Light Model:	Amber
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Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss development proposals and identify site specific issues.

Summary of outcome/Main issues raised:

Determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended, as well as the objectives of the National Planning Policy Framework (February 2019).

It is our opinion that the proposed design presents a better 'fit' within the local community and immediate street scape, offering a reduced visual impact upon an area of adopted highway identified, as situated out with a conservation area or other such restrictive designation.

It is considered that the design and siting, accords with Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for the local planning authority to support the request for plans to speed up digital infrastructure rollout set out by Ministers on the 27<sup>th</sup> August 2020.

**School/College**

Location of site in relation to school/college:

There are no schools within 400m of the proposed location.

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 (only required for an application for prior approval)**

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

**Developer's Notice**

Copy of Developer's Notice enclosed?	Yes	
Date served:	1 <sup>st</sup> December 2021	

**3. Proposed Development**

<p>The proposed site:</p> <p>CK Hutchison Networks (UK) are in the process of supporting the UK Government's Digital connectivity objective and providing a critical role in building the UK's fastest mobile network to provide improved coverage and capacity, most notably in relation to 5G services.</p> <p>The technical details of this proposal are illustrated within application design drawings as attached.</p> <p>The very nature of installing new 5G mast infrastructure within such an urban setting requires a highly considered balance between the need to extend practical coverage reach with that of increasing risk of visual amenity intrusion. In this location, existing mast sites are not capable of supporting additional equipment compliment to extend coverage reach across the target area and prospective 'in-fill' mast sites are extremely limited.</p> <p>There is an acute need for a new base station to provide effective service coverage and in this case, the height of the proposed street pole is the minimum required to bring the benefits of 5G to this area.</p> <p><b>Figure 1 - Site Photograph's</b></p>
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Proposed location of a new mast shown above will assimilate well into the immediate street scene and not be detrimental.

The proposed site option is considered the best available compromise between extending 5G service across the target 'coverage hole' with the selected street works pole height and associated antenna and ground-based cabinets restricted to the minimum height which is capable of providing the required essential coverage.

The equipment cabinets are located at the base of the new pole and (unless the site is located in Article 2 (3) land), such installations are deemed Permitted Development without Prior Approval and therefore do not form part of the proposal from a planning consideration perspective as set out in the undernoted planning analysis:

**Planning Policy Relevant to the Development Site:**

Development Plan Policy: National Planning Policy Framework (February 2019)

The relevant Local Plan against which the application will be determined, is

Extracts have been taken from the Edinburgh City Council Website. Highlighting the importance of up-to-date telecommunications/Connectivity.

## 5) Resources and Services

- 90 The LDP has a role in supporting development which meets needs vital to modern life. These include the use of natural resources such as energy and materials, and the provision of network services such as water supply, drainage and telecommunications.

### Telecommunications

#### Policy RS 7 Telecommunications

Planning permission will be granted for telecommunications development provided:

- a) the visual impact of the proposed development has been minimised through careful siting, design and, where appropriate, landscaping
- b) 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
- c) the proposal would not harm the built or natural heritage of the city.

306 The provision of new telecommunications infrastructure is essential to economic competitiveness. The telecommunications industry must be enabled to expand and diversify, but this must be undertaken sensitively and imaginatively, and with minimum environmental impact. Telecommunications equipment such as antennas, mobile phone masts and base stations can have a significant visual impact in both urban and rural areas. Telecommunications operators are therefore required to demonstrate that all practicable options to minimise impact have been explored, and the best solution identified.

307 There will be a limited number of locations, including city landmarks such as Arthur's Seat and Salisbury Crag, where the impact of an installation cannot be satisfactorily minimised, and where it will therefore be unacceptable in principle. In other locations, individual proposals may be acceptable but where there is a concentration of these uses, consideration will be given to the cumulative visual impact. Conditions will be imposed on any consent, requiring the removal of any mast or apparatus and the reinstatement of a site to its former condition when it becomes redundant.

308 Edinburgh is one of ten UK cities to receive early delivery of high speed broadband and large areas of wireless connectivity in public areas. The latter will require installation of new equipment, some of which may require planning permission or conservation area / listed building consent. These will be assessed using the above policy if appropriate and a separate non-statutory guideline on telecommunications.

The Adopted Roads Register shows that the proposed location falls within adopted Highway.

The National Planning Policy Framework (NPPF) section of this Supporting Statement goes into detailed analysis of why this site is in compliance with the NPPF.

**Policy Analysis:**

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.”*

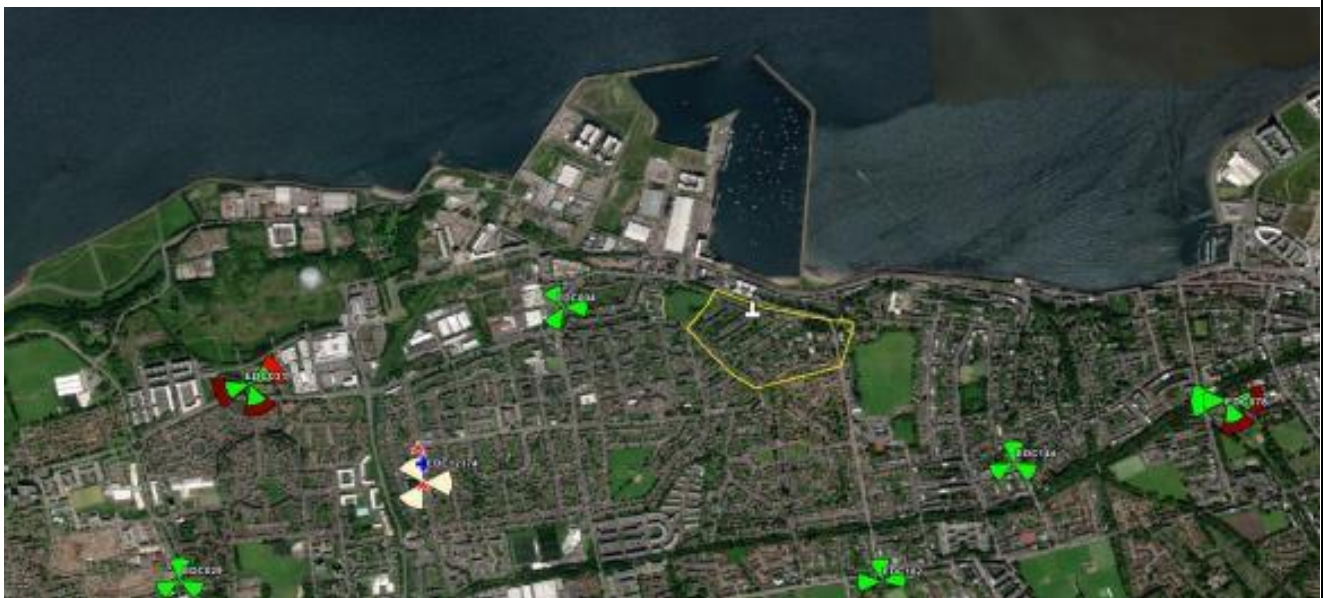
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: “high quality communications” (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

The design of the proposed antenna and ground-based cabinets is considered to be the least visually intrusive option available. Whilst it is accepted that there will be a localised visual increase through the installation of additional apparatus, it is considered that this will not overly detract from the character of the existing streetscape.

**Enclosed map showing the cell centre and adjoining cells:**

The optimum solution from the perspective of cell planning and radio coverage has been put forward. The target Search Area (shown as by the red outline) and existing H3G (Three) UK sites are illustrated within Figure 4 below:

**Figure 4** - Coverage Map: Proposed installation must be located close to the area shown below.





Type of Structure	
Description: Proposed Phase 8 Monopole c/w wraparound Cabinet at base.	
Overall Height:	See drawings
Height of existing building	N/a
Equipment Housing:	
Length:	See drawings
Width:	See drawings
Height:	See drawings
Materials	
Tower/mast etc. - type of material and external colour:	See drawings
Equipment housing - type of material and external colour:	See drawings

Reasons for choice of design:
<p>The proposed installation is an H3G LTE (Three) Phase 8 Monopole c/w wrap-around cabinet and 3 no. additional equipment cabinets which will support the UK Government Digital connectivity vision and provide a basis for support from the local planning authority to speed up digital infrastructure rollout set by Ministers on 27 August 2020. Such development will facilitate educational benefits, providing access to vital services, improving communications with the associated commercial benefits for local businesses, enabling e-commerce and working from home as well as enjoying access to social, media and gaming for leisure time activities.</p> <p>In accordance with the requirement set within National Planning Policy Framework (February 2019) guidelines; the proposed 'Streetworks' design has been selected to minimise visual impact upon the street scene by integrating with existing street furniture.</p>

#### 4. Technical Information

<p>ICNIRP Declaration attached</p> <p>ICNIRP (International Commission on Non-Ionizing Radiation Protection) aims to protect people and the environment against adverse effects of non-ionizing radiation (NIR). 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. When</p>	Yes	
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determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		
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## 5. Technical Justification

Reason(s) why site required
<p>The National Planning Policy Framework (NPPF) clearly states that authorities should NOT question the need for the service, nor seek to prevent competition between operators. Notwithstanding this, the Applicant considers it to be important to explain the positive technical justification for the site and how the facility fits into the overall network.</p> <p>The site is required to provide new 5G coverage for H3G LTE, improving service in and around this area subject to this application. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m.</p>

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

Discounted Options
<p>In accordance with the sequential approach outlined in the NPPF, the following search criteria have been adopted. Firstly, consideration is always given to sharing any existing telecommunication structures in the immediate area, secondly; consideration is then given to utilising any suitable existing structures or buildings and thirdly, sites for freestanding ground-based installations are investigated.</p> <p>This sequential approach is outlined below:</p> <ul style="list-style-type: none"> <li>a) Mast and Site Sharing</li> <li>b) Existing Buildings Structures</li> <li>c) Ground Bases Installations</li> </ul> <p>In compliance with its licence and the sequential approach outlined in the NPPF, all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Mast Data register is always examined prior to the submission of a planning application.</p>

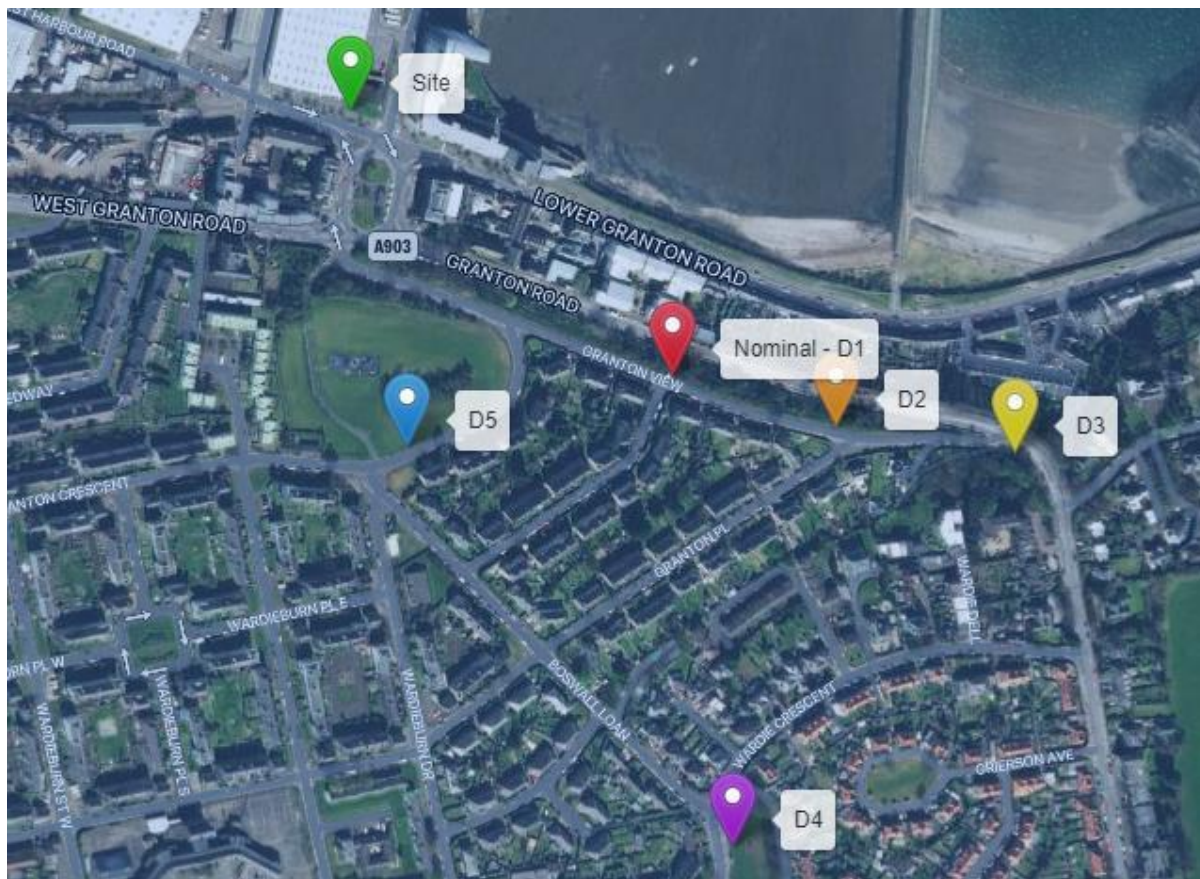
### Discounted Options and National Planning Policy:

<p>The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 116:</p> <p><i>“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure”.</i></p> <p>Typical to most 5G cell site deployment within the urban environment, this is an extremely constrained cell search area. It is recognised that the very nature of installing new 5G mast</p>
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infrastructure within a dense urban setting requires a well-considered balance between the need to extend practical coverage with that of increasing risk of visual intrusion. A street pole with associated cabinets is deemed to be the only and most appropriate solution available. The DSA (Designated Search Area) is illustrated herein, together with site locations that were investigated and subsequently discounted.

**Discounted Options:**

Site	NGR	Discounted Reason
D1 – Granton View	323909 , 676961	Discounted option due to pavement width restrictions, proximity to residential housing and an electrical substation.
D2 – Granton View	324025 , 676922	Discounted option due to pavement width restrictions and proximity to residential housing.
D3 – Granton Road	324152 , 676901	Discounted option due to pavement width restrictions and visibility splay concerns.
D4 – Grierson Road	323946 , 676626	Discounted option due to pavement width restrictions and proximity to residential housing.
D5 – Granton Crescent	323719 , 676913	Discounted option due to pavement width restrictions and proximity to residential housing.



## 7. Additional Relevant Information

### Background to the Proposal

H3G supports Government ambition to be a global leader in the next generation of mobile technology set out within its March 2017 white paper, 'Next Generation Mobile Technologies: A 5G strategy for the UK' and expand its mobile network across the local planning authority area and specifically in this instance, to enhance 5G coverage levels in and around the site subject to this application.

Modern mobile phone base stations operate on a low power and accordingly, need to be located within close proximity to the areas they are required to serve. Increasingly, people are also using mobile devices in the home which requires the installation of base station infrastructure closer to such residential areas.

#### **DEVELOPMENT PLAN POLICY:**

Development plan considerations have a special significance in law. Section 54A of the Town and Country Planning Act 1990 (The Act), and re-iterated in Section 38 of the Planning and Compensation Act 2004, stated that:

*"Where in making any determination under the Planning Acts regard is to be had to the Development Plan, determination shall be made in accordance with the Development Plan unless material considerations indicate otherwise."*

#### **NATIONAL PLANNING POLICY:**

The Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The National Planning Policy Framework (NPPF July 2018) sets out the Government's planning policies for England and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including;

- Economic Role - contributing to building strong, responsive and competitive economy;
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

The NPPF contains at its core a presumption in favour of sustainable development which runs through both plan-making and decision-making processes. The NPPF recognises the vital importance of high-quality telecommunications and dedicates a whole chapter to this area. Chapter 10 of the NPPF outlines the Governments support for high quality communications. The paragraph extracts highlighted below, clearly outline the overarching support from Central Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

Paragraph 112 states:

*“Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high-quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).”*

It continues in Paragraph 113

*“The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.”*

Operators always follow the sequential site selection process. Where an existing site can be shared or upgraded, this will always be adhered to before a new installation is put forward for consideration. In this instance, there is no scope to upgrade existing infrastructure or site share with other operators.

The support for telecoms and the need not to constrain Operators is laid out in Paragraph 116

*“Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”*

In addition to the above, we would also draw to your attention a recent Appeal Decision which followed on the back of a refused planning application within Walworth, London, SE17 3DU. The application (ref: 20/AP/1187) was refused on the following grounds: - 1) The 20m monopole does not comply with part (a) of Part A.1 of 16 of the GPDO 2015 and 2) The proposed cabinets and monopole would introduce excessive clutter on the footway, disrupting pedestrians. The appeal was brought by Hutchison 3G (UK) Ltd against the Council of the London Borough of Southwark. The appeal was allowed on the 10<sup>th</sup> November 2020 (Appeal Reference: APP/A5840/W/20/3254830).

## **Conclusion**

Government considers that high-speed mobile connectivity is the lifeblood of a Community. H3G (Three) is committed to providing improved network coverage and capacity, most notably in relation to 5G services.


Taking into account the site-specific factors and technical constraints, available options and planning constraints, it is considered that the proposed street pole clearly represents the optimum environmental solution to extend coverage to the target Community.

The use of the public highway to accommodate a new telecommunications installation 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.

In accordance with a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the National Planning Policy Framework.

On this basis, favourable determination as to whether the prior approval of the authority will be required to the siting and appearance of the proposed installation is invited under Part 16, Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015.

### Contact Details

Name: (Agent)	<u>Tom Gallivan</u>	Telephone:	<u>07841104028</u>
Operator:	<u>H3G</u>	Fax no:	<u>N/A</u>
Address:	<u>Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP</u>	Email Address:	<u>t.gallivan@dotsurveying.co.uk</u>
Signed:	<u></u>	Date:	<u>29<sup>th</sup> November 2021</u>
Position:	<u>Planning Manager</u>	Company:	<u>Dot Surveying</u>
		(On behalf of above operator)	