WHP Response to Queries

Flatt Farm Pre-Planning Consultation - 3 UK SRN1089

Questions to the agent WHP Telecoms following the CC meeting of March 21st

This paper summarises questions raised by the CC and residents as requested by WHP Telecoms Ltd as part of the pre-planning work they are undertaking to develop a new 4G mast at Flatt Farm.

First 4 questions below were emailed to WHP prior to the CC meeting raised by members of the CC, but answers were not received in time to circulate at the meeting on Mar 21st.

At the meeting a series of issues were raised and these are summarised from questions 5 onwards. Please note the updated response provided on Point 4.

NCC seeks answers to these prior to the **next CC meeting planned on April 11th ideally requests attendance by the agent/developer** to answer the community concerns.

1. Is this off grid, hence the need for generator and oil tank? Or where is the cabling going for supply? Power solution – we are still in the process of confirming the power solution with the owner of the property, however the intention is for the mast site to have a hardline power connection provided via the regional electrical company (REC) and we are currently in discussion to determine the route which will be most suitable to them. The location which is highlighted for generator and fuel tank appears on all of our planning drawings and simply denotes a space for a tow-to-site generator and tank in the event that the REC connection was to go down. I trust this also answers your question on refuelling, which would only be required in the event a tow-to-site was deployed.
2. Resilience - in the event the community experiences more flooding to the levels of the 2020 and 2021 flooding will this impact on the mast effectiveness. Will it operate in a power cut or if flood waters rise and damage other localised masts? Is it a stand alone? How frequently will the oil tank need be refreshing? Resilience – Flooding should not impact the effectiveness of the mast. The ground is over 20m in elevation higher than that of the Liddel Water, so should not reach the site location, even in an extreme case of rainfall and the compound itself will be raised 200mm to further protect the site from water. If the hardline power connection was to go down as the result of a power cut, the site would be offline for a period. However, this is the reason the space remains available for a tow-to-site generator as mentioned above. Our client is still in the process of investigating the most suitable way to connect this site into their network, however any other mast in the area which would be suitable to connect to appear to be at an even higher elevation than this site and therefore very unlikely to be impacted by flood.
3. Timing – can you indicate subject to positive planning outcomes the length of the build program and when you expect it to be operational? Timing – Our aim is to have the mast online as soon as possible. The civils works to create the compound takes approx. 5 weeks, with the tower installation and addition of the equipment completed thereafter over a short period. All going well with planning etc, we would hope to have the site online towards the end of summer this year.
4. What sort of coverage area will it infill? A map would be helpful. Coverage Map has been provided to the Community Council so that they can better assess the uplift provided by this proposed site. As the information is commercially sensitive, our client has asked that this not be shared within the public forum, however we can advise the site would provide uplift to approx. 30km2 of previously uncovered area including the village of Newcastleton. It should be noted that the proposed mast would have 3no telecoms operators present from the outset (Three Mobile, Vodafone and O2) meaning improved coverage for users on each of these networks (and any smaller providers who use the same networks – Tesco Mobile uses O2’s network for example). By sharing the proposed structure from the outset, the Operators are able to provide improved coverage to a range of residents/visitors without the need to each have an individual mast, reducing the number of mast required in a given area, which is one of the main aims of the Shared Rural Network Project. This also allows residents to shop around for the best deals by offering a wider range of choice when choosing a mobile network.
5. Why is the mast being built in this location? Where are the other (at least two) masts that need to connect to it by line of sight? In relation to this mast what other locations have been considered? This surely cannot be the only suitable site, or is this the only site that they have been given permission for? The mast is proposed in this specific location, as it has been highlighted by our clients Radio team as the most suitable location to meet the coverage demands of the area within the scope of the SRN Partial Not-Spot Programme. We are still in the process of evaluating the most appropriate solution for linking the proposed site back into the network, be this via Line-of-site or a hardline fibre connection.
6. Why does the mast have to be at the height that it is? The design submitted by WHP shows the surrounding trees at approx. 12m (40ft). The mast elevation shows the total height of the equipment being about 4m. Therefore, the total height of the mast needs only to be about 16m or so to clear the surrounding trees. Clarke telecom confirmed this in an email to John Lamont dated 5/7/22 when they said that “the top of the mast needs to be clear of the trees so the antennas are not blocked and will be able to reach the target coverage area.” If the mast is left at its proposed height, more than half its length, or 40 feet, will protrude above the surrounding woodland, such as there is. That is a clear breach of Council Policy IS15 (a) and (b) (i) and (iii). A drop in tower height will reduce the effective range of the mast, reducing the benefit provided to the local community. The proposed height of the tower must also take into account the surrounding landscape and any changes to this landscape throughout the lifetime of the site. The woodland in the area surrounding the site will regrow and we must consider this when proposing the height of the mast to ensure it remains effective throughout the lifetime of the site. As shown in the photomontage report provided, the site location is well screened from the surrounding area by the existing tree cover. It should be noted that the images were taken during the winter months and this screening will only improve as the foliage increases.
7. Will WHP provide a photomontage of the proposed site? Included with latest response.
8. Will a visual amenity assessment be undertaken of the site? When the council officer dealing with the previous application became aware that the woodland had been felled, he expressed concern that the screening to the site might be reduced. He also wondered if the height of the mast could be lowered. He asked the applicants to submit a revised plan addressing these issues. No response to this was ever provided by the applicants. Nothing has changed at the site and the council themselves must have unresolved concerns about screening and mast height, and a visit would address this. As shown within the photomontage report provided, the proposed mast is well screened by foliage from the majority of surrounding locations and in locations where it is visible, it is only the top of the tower which would be seen. Although I note this has not been shown in the photomontage, it its proposed that the mast and all associated equipment will also be painted fir green (RAL6009) to better blend into the surrounding landscape.
9. What lighting would be provided on the mast? No lighting is proposed on the mast and would only be required at the specific request of the MOD. In the event they did request an Aircraft Warning Light, this would be proposed as an infrared light, which is not visible to humans, but would be picked up by planes etc.
10. What will WHP do about habitat surveys? The planning proposal refers to the removal of extant and fallen trees. These are trigger activities for surveys of European Protected

Species (as per SBC technical advice note #1). Previously provided evidence of bat activity at the site. What steps do WHP intend to take about this, given that any disturbance near the site could amount to a criminal offence? Thank you to the Community Council for the information provided on this to date. Given the recommendations provided, we have instructed an ecologist to review the area and determine if any further surveys are required.

1. Please provide the Environmental Impact Assessment on the wildlife inhabiting the area. An ecology survey was carried out in February 2023. It was established that habitat surveys were legally required covering lapwings, curlews, skylarks, and badgers. There are also 10 other red listed species in this area. Please see comment from point 10.
2. It is understood that the intended site for construction stands on a peat bog. Please provide details of your survey on this. An Environmental Impact Assessment is required to specify the existence and depth of the peat on site as per the Scottish Government guidelines. These guidelines conserve peatlands to protect carbon emissions. Please provide details of when this will be carried out. The ground was probed during the initial survey. Firm ground was found at between 300mm and 800mm and no obvious indication of Peat was identified as part of the survey, nor is the location outlined as Peatland by Nature Scot’s environmental maps. Further ground investigation works will be completed on the access route and site location in due course. In the event that significant deposits are found, appropriate steps will be taken to mitigate any impact.
3. Please provide the insurance/compensation documents covering health issues that may arise from living near the mast, also any damage to businesses and wildlife populations. The planning application will include drawings of the site design and location along with an ICNIRP certificate. ICNIRP is the International Commission for Non-Ionising Radiation Protection and is recognised by the World Health Organisation, the certificate is to confirm that the site complies with the ICNIRP standards. All our sites are designed and built to be fully compliant with ICNIRP Guidelines on limiting exposure to electromagnetic waves – the guidelines cover all the population including children. In its response to its [Consultation on Changes to permitted development rights for electronic communications infrastructure](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fconsultations%2Fchanges-to-permitted-development-rights-for-electronic-communications-infrastructure-technical-consultation%2Foutcome%2Fchanges-to-permitted-development-rights-for-electronic-communications-infrastructure-government-response-to-the-technical-consultation&data=05%7C01%7CNicola.Davies3%40three.co.uk%7Cb684342c1a984dcba66e08da761ad5e1%7Ca095b75b77a24e28afc227edd1d6b0ab%7C1%7C0%7C637952154861688684%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=nCbyfAEVR8acphfy3RyA3kKS7jbyD1Mh7%2BpPvh2QEHQ%3D&reserved=0), the Government stated ‘there is currently no evidence that EMF radiation from wireless networks has impacts on the population levels of either animals or plants.’
4. Please provide any insurance/compensation documents covering residents who may experience damage to watercourses or other essential utilities. It is understood that due to the siting of utilities to the two properties close to the mast, there may be serious issues that could cause damage once construction begins. Appropriate insurance for the owner of the property will be put in place to ensure suitable cover for any potential damage to the property, this will include any claims by tenants of the property or third parties. With specific reference to utilities, a services search would be completed prior to any works being undertaken and a CAT scan will be completed prior to breaking ground to identify any underground pipes/cables. Trial digs, following our clients “Safe Breaking Ground” procedure will also be completed during the construction process, to ensure any unidentified services are identified and protected.
5. Please provide complete evidence of the studies undertaken to validate the ICNIRP “safe” levels that you are relying on to support this planning application. These should be studies undertaken over a period more than 5 years. ICNIRP review the guideline levels regularly and have not changed the approved levels in a number of years. As such, the proposed equipment falls within the safe levels outlined by the relevant governing body. The UK Health Security Agency (previously Public Health England) advises the UK Government on the public health aspects of exposure to radio waves, including those from mobile phone base stations and other radio transmitters in the environment.

Read more:

[**Mobile phone base stations: radio waves and health**](https://www.gov.uk/government/publications/mobile-phone-base-stations-radio-waves-and-health/mobile-phone-base-stations-radio-waves-and-health)

**5G technologies: radio waves and health - GOV.UK (www.gov.uk)**

You can also find some useful information about 5G technologies provided by Ofcom:

[**5G mobile technology: a guide (ofcom.org.uk)**](https://www.ofcom.org.uk/__data/assets/pdf_file/0015/202065/5g-guide.pdf)

(Please note, while the latest guidance is labelled as 5G, it should be noted that the technologies proposed on this mast as part of the application are 4G only.)

1. Please provide evidence of the distances between the proposed mast and the two residential buildings nearby to establish their proximity to the mast. Abbotshaw Cottage is approximately 260m from the proposed site location, 320m from Burn Cottage and the closest section for Flatt Farm is approximately 375m from the site.

**NCC March 28th 2023**

**Response provided by WHP April 11th 2023**