



COMHAIRLE NAN EILEAN SIAR

Planning Register - Part 1

Application Details

Reference Number	24/00127/TELPA
Date registered as valid	27/03/2024
Description of Development	Installation of 4.0m high slimline support pole with 1No. 0.3m DIA transmission dish, 1No. MCA Cabinet, 7No. concrete safety bollards, and ancillary development thereto.
Address or description of location to which the development relates	MCA Mast, Filling Station, Breaclete, Bernera, Isle of Lewis
Co-ordinates	E 116 034 N 936 219
Applicant Name	Telent
Applicant Address	Point 3, Haywood Rd, Warwick, CV34 5AH
Agent name (if applicable)	Mr Martin Brown
Agent address (if applicable)	Telent, Rutland House, 5 Allen Rd, Livingston, EH54 6TQ

The above application summary is accompanied by plans and drawings sufficient to describe the development and where relevant any design statement.

Important Note: on Tuesday 07 November 2023, Comhairle nan Eilean Siar experienced a criminal cyber incident and is working with Police Scotland, the Scottish Government and the National Cyber Security Centre to investigate the matter.



The Online Planning Portal remains unavailable as does our suite of integrated software and hardware systems. In order to enable access by the wider public to application documents and consult upon planning applications, interim systems have been put in place on the temporary website of Comhairle nan Eilean Siar, including a rudimentary facility to display a limited number of documents per application.

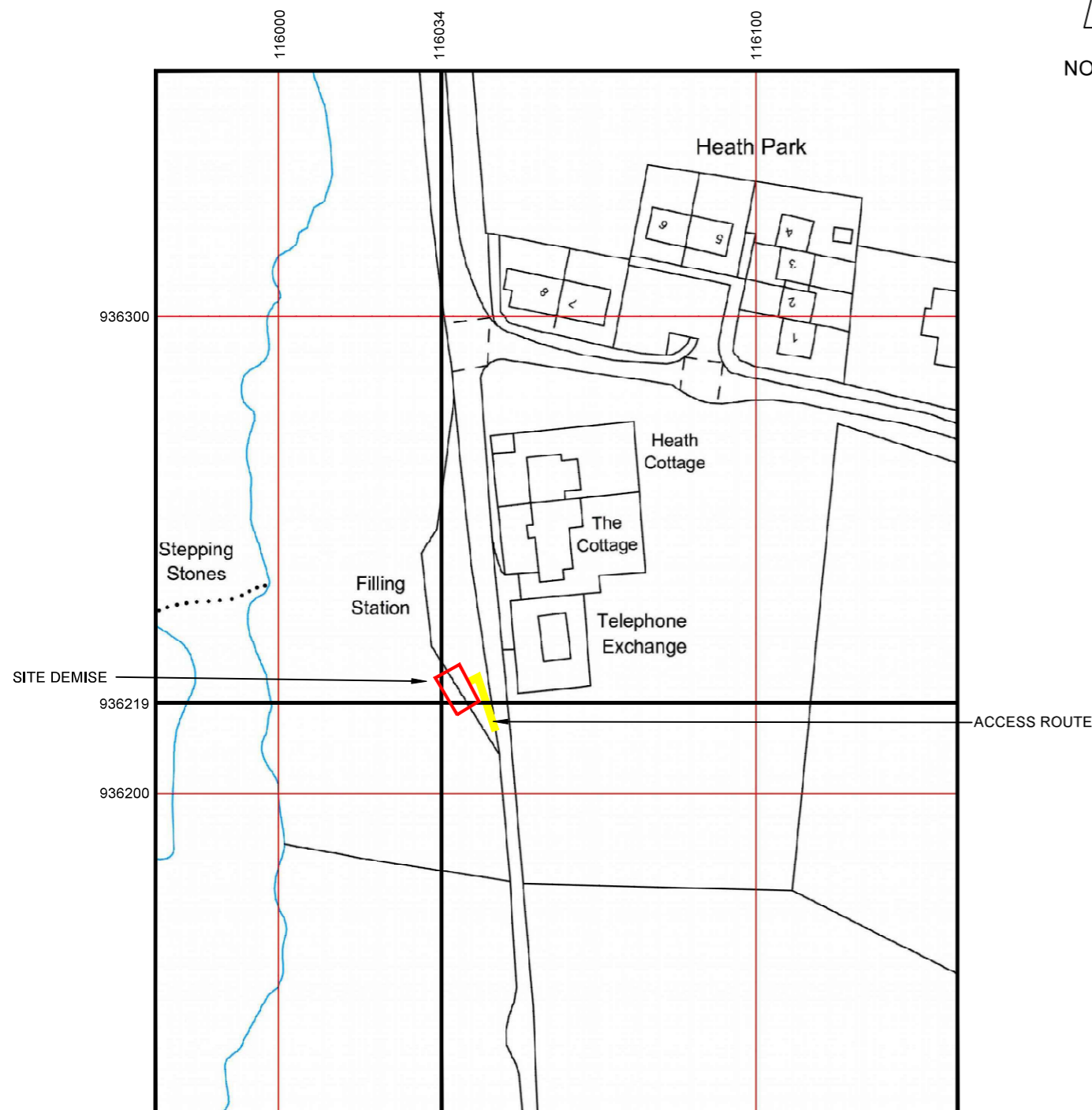
Any party wishing to view the application file in full may do so at the offices of Comhairle nan Eilean Siar at Sandwick Road, Stornoway Isle of Lewis, HS1 2BW or Balivanich, Isle of Benbecula. HS7 5LA, ordinarily between 9am and 5pm Monday to Friday (excluding public and local holidays). It is recommended that in advance of visiting an office to view an application that you make an appointment by sending an email to planning@cne-siar.gov.uk

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R. E: 116034 N: 936219

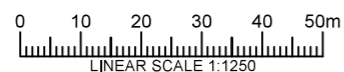
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- Demise: Outlined in Red 
- Access Route: Solid Yellow 

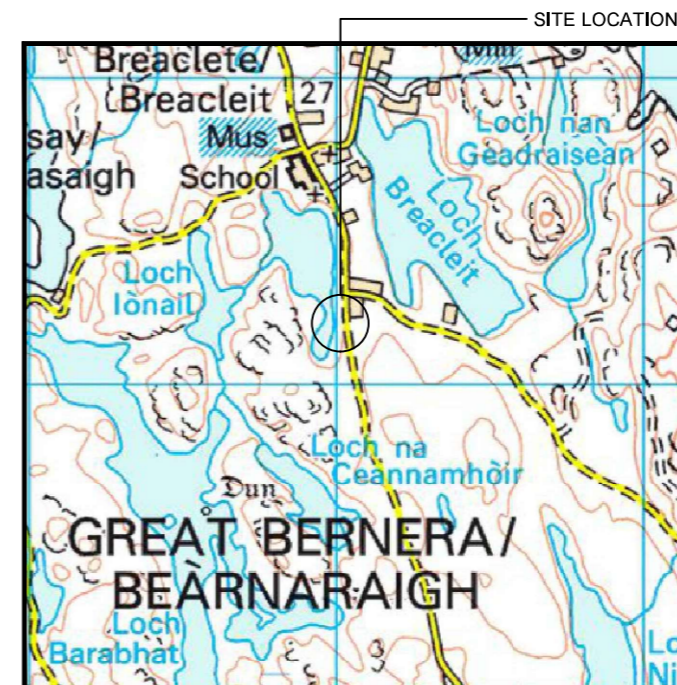


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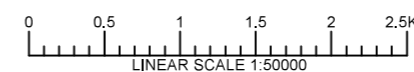
BLOCK PLAN



NORTH



LOCATION PLAN



NORTH



PHOTOGRAPH OF PROPOSED SITE

A	PLANNING FIRST ISSUE	AGM DR	22.01.24
REV	DESCRIPTION OF REVISION	BY CH	DATE

DESIGN CONSULTANT	PROJECT / SCOPE
TELENT	MCA MICROWAVE

SITE NAME AND ADDRESS
RNIR052 Great Bernera
Fuel Station
Breacleit,
Great Bernera,
HS2 9LT

DRAWING TITLE:
BLOCK AND LOCATION PLANS

PURPOSE OF ISSUE:
PLANNING

DRAWING NUMBER:
101

SCALE:	DRAWN:	DATE:	REV:
AS SHOWN @ A3	AGM	18.01.24	
CHECKED:	DATE:	APPROVED:	DATE:
DR	18.01.24	DP	18.01.24

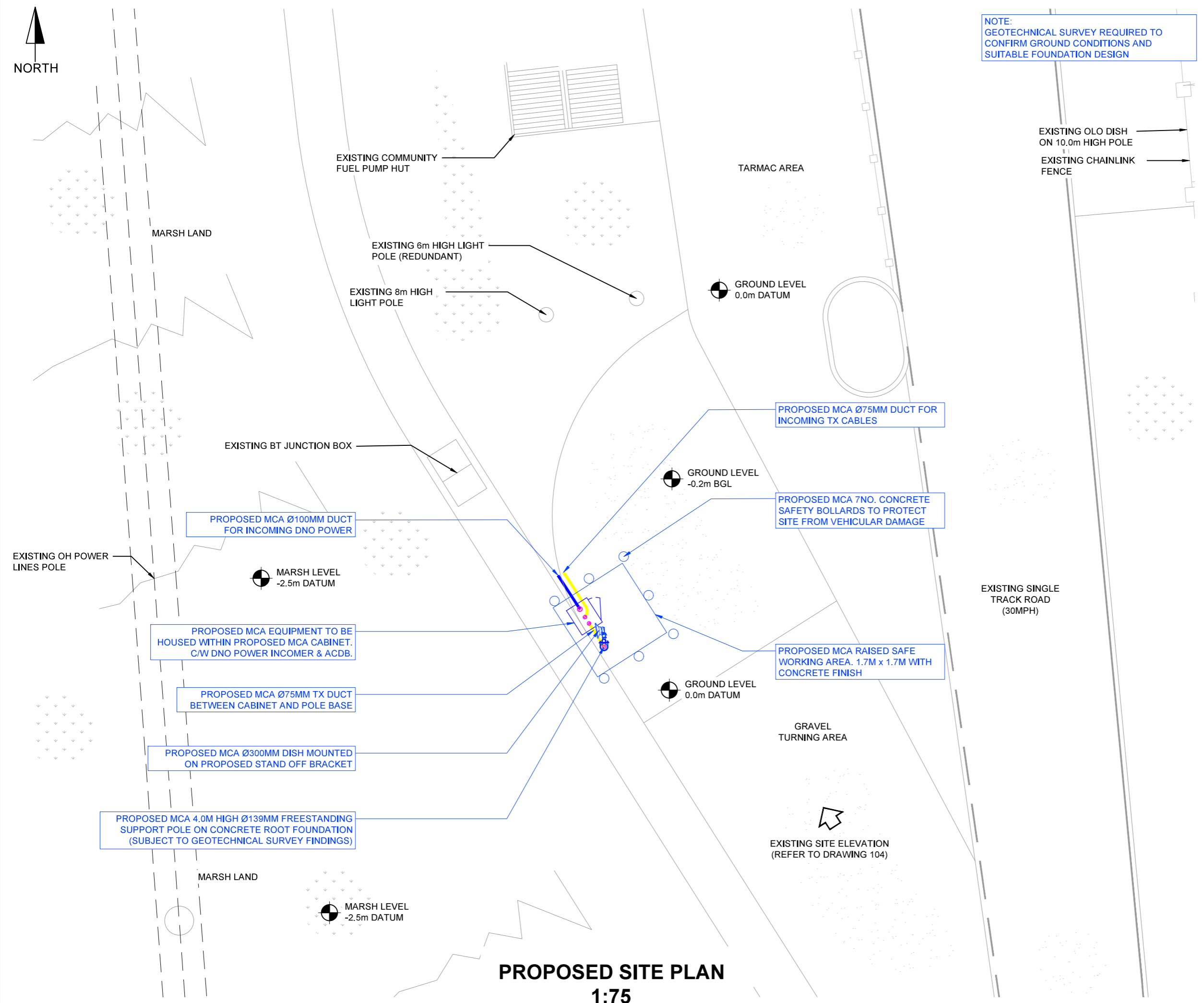


NORTH

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R. E: 116034 N: 936219

NOTE:
GEOTECHNICAL SURVEY REQUIRED TO
CONFIRM GROUND CONDITIONS AND
SUITABLE FOUNDATION DESIGN



PROPOSED SITE PLAN 1:75

A	PLANNING FIRST ISSUE	AGM DR	22.01.24
REV	DESCRIPTION OF REVISION	BY CH	DATE

DESIGN CONSULTANT	PROJECT / SCOPE
TELENT	MCA MICROWAVE

Maritime & Coastguard Agency
telent
talent with technology

SITE NAME AND ADDRESS
RNIR052 Great Bernera
Fuel Station
Breaclete,
Great Bernera,
HS2 9LT

DRAWING TITLE:
PROPOSED SITE PLAN

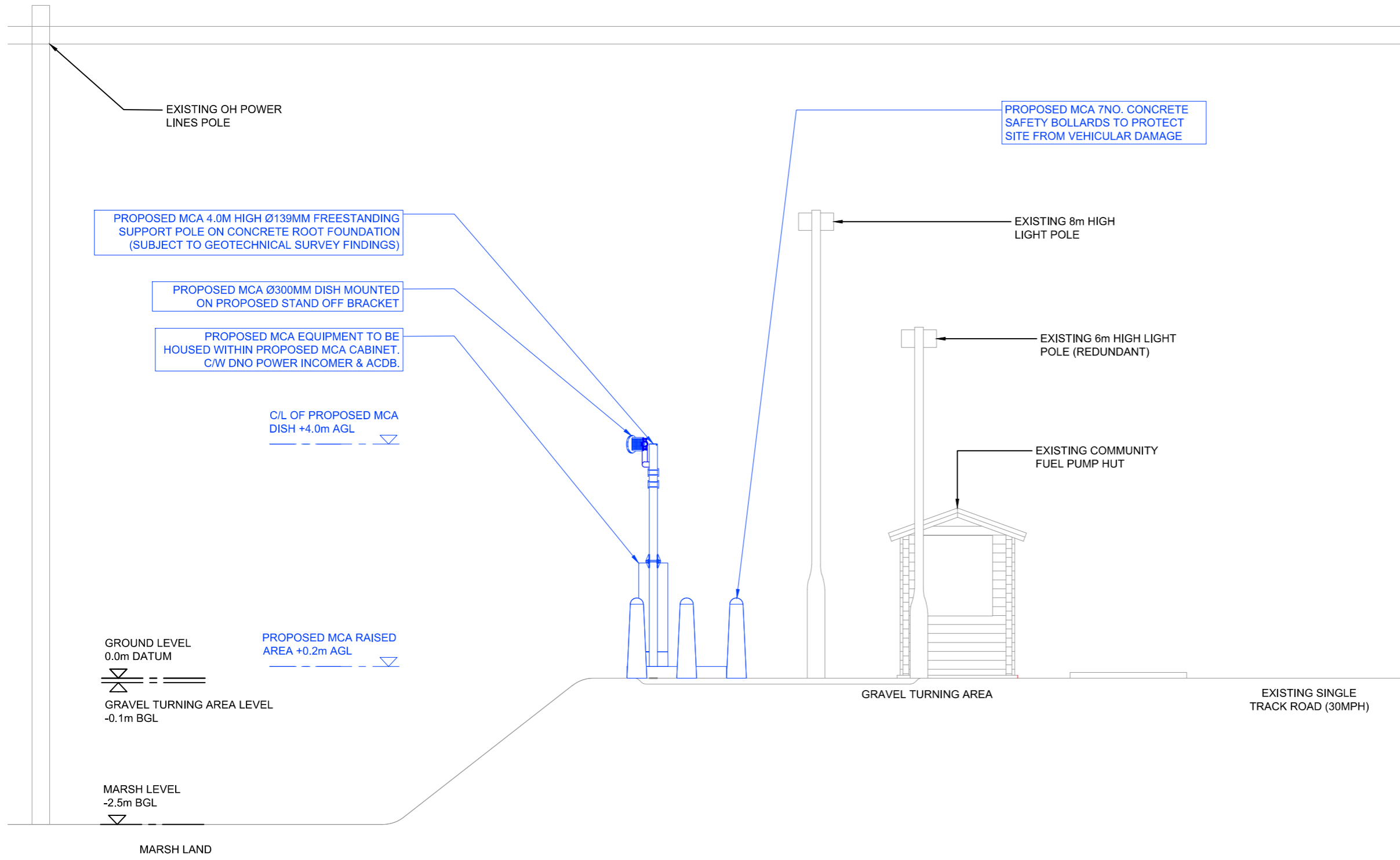
PURPOSE OF ISSUE:
PLANNING

DRAWING NUMBER:
103

SCALE:	DRAWN:	DATE:	REV:
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CHECKED:	DATE:	APPROVED:	DATE:
DR	18.01.24	DP	18.01.24

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A3

NOTE:
GEOTECHNICAL SURVEY REQUIRED TO CONFIRM GROUND CONDITIONS AND SUITABLE FOUNDATION DESIGN



PROPOSED SITE ELEVATION
1:75

A	PLANNING FIRST ISSUE	AGM	DR	22.01.24
REV	DESCRIPTION OF REVISION	BY	CH	DATE

DESIGN CONSULTANT	PROJECT / SCOPE
TELENT	MCA MICROWAVE

telent
talent with technology

SITE NAME AND ADDRESS

RNIR052 Great Bernera
Fuel Station
Breaclete,
Great Bernera,
HS2 9LT

DRAWING TITLE:
PROPOSED SITE ELEVATION

PURPOSE OF ISSUE:
PLANNING

DRAWING NUMBER:
105

SCALE: AS SHOWN @ A3	DRAWN: AGM	DATE: 18.01.24	REV: A
CHECKED: DR	DATE: 18.01.24	APPROVED: DP	DATE: 18.01.24

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10mm



NORTH

100mm
50mm
10mm

A3



EXISTING SITE PLAN
1:75

ALL DIMENSIONS ARE IN mm UNLESS NOTED OTHERWISE

N.G.R. E: 116034 N: 936219

A	PLANNING FIRST ISSUE	AGM	DR	22.01.24
REV	DESCRIPTION OF REVISION	BY	CH	DATE

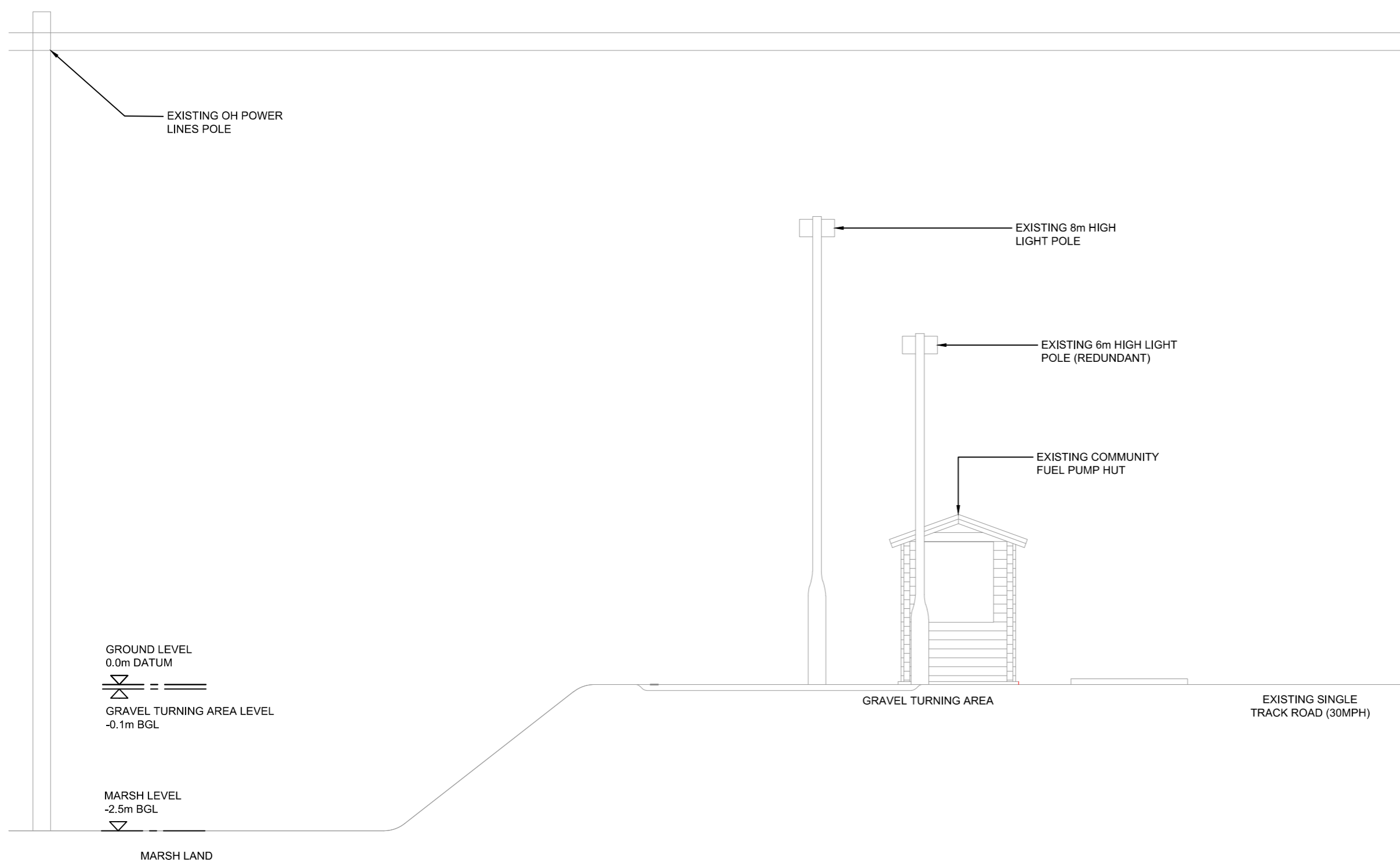
DESIGN CONSULTANT	PROJECT / SCOPE
TELENT	MCA MICROWAVE

SITE NAME AND ADDRESS
RNIR052 Great Bernera
Fuel Station
Breaclete,
Great Bernera,
HS2 9LT

DRAWING TITLE: **EXISTING SITE PLAN**
PURPOSE OF ISSUE: **PLANNING**

DRAWING NUMBER: **102**

SCALE: AS SHOWN @ A3	DRAWN: AGM	DATE: 18.01.24	REV: A
CHECKED: DR	DATE: 18.01.24	APPROVED: DP	DATE: 18.01.24



EXISTING SITE ELEVATION
1:75

A	PLANNING FIRST ISSUE	AGM	DR	22.01.24
REV	DESCRIPTION OF REVISION	BY	CH	DATE

DESIGN CONSULTANT	PROJECT / SCOPE
TELENT	MCA MICROWAVE

Maritime & Coastguard Agency
 telent
 talent with technology

SITE NAME AND ADDRESS
 RNIR052 Great Bernera
 Fuel Station
 Breaclete,
 Great Bernera,
 HS2 9LT

DRAWING TITLE:
EXISTING SITE ELEVATION

PURPOSE OF ISSUE:
PLANNING

DRAWING NUMBER:
104

SCALE: AS SHOWN @ A3	DRAWN: AGM	DATE: 18.01.24	REV: A
CHECKED: DR	DATE: 18.01.24	APPROVED: DP	DATE: 18.01.24

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Our Ref: MCA/GreatBernera/MB

Date: 21st March 2024

F.A.O Norma MacLeod
Bernera Community Association
Bernera Community Hall
Breaclete
Great Bernera
HS2 9LT

Sent via E-Mail: berneraca@gmail.com

Dear Norma,

Telent Technology Services Ltd

Installation of Electronic Communications Apparatus

Please find enclosed a Notice informing you that **Telent Technology Services Ltd** will be submitting an application to Comhairle Nan Eilean Siar for a prior approval determination for the installation of electronic communications apparatus at Great Bernera Fuel Station, Breaclete, Great Bernera, HS2 9LT.

This Notice is provided in accordance with Class 67 (1)(a) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended), which requires landowners to be informed of the submission of the application. You will see from the Notice that you may make representations about the application direct to the Local Planning Authority should you wish to do so.

Yours sincerely,



Martin Brown
Head of Town Planning
01506 721023
Martin.brown@telent.com

**On behalf of Telent Technology Services Ltd
Developer's Notice to Landowners**

Proposed development at: Great Bernera Fuel Station, Breaclete, Great Bernera, HS2 9LT
National Grid Reference: Easting 116034 Northing 936219

I hereby give notice, in accordance with Class 67 (1)(a) of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (as amended), that Telent Technology Services will be applying to Comhairle Nan Eilean Siar in order to determine whether their Prior Approval is required for the following development:

- The proposed installation of a 4.0m high slimline support pole along with 1No. 0.3m DIA transmission dish, 1No. MCA Cabinet, 7No. concrete safety bollards, along with ancillary development thereto.

The application will be made to:

Head of Planning
Comhairle Nan Eilean Siar
Council Offices
Sandwick Road
Stornoway
Isle of Lewis
HS1 2BW

The applications will be made available for public inspection at the offices of the local planning authority during usual office hours.

Any person who wishes to make representations about the siting and appearance of the proposed development may do so in writing to the local planning authority at the above address. A period of at least 21 days, from the date of this notice, will be allowed for any such representations to be received by the Local Planning Authority.

Name: Martin Brown

Signed: 

On Behalf of: **Telent Technology Solutions Ltd**

Date: 21/03/2024

**Proposed Installation of MCA Telecommunications Site at
Great Bernera Fuel Station, Breaclete, Great Bernera, HS2 9LT
(NGR: E-116034, N-936219)**

**STATEMENT IN SUPPORT
OF
APPLICATION FOR PRIOR APPROVAL
INCORPORATING THE DESIGN STATEMENT**

MARCH 2024

**Telent Technology Services Ltd
Rutland House
5 Allen Road
Livingston
Scotland
EH54 6TQ**

Ref: MCA/GreatBernera/MB

EXECUTIVE SUMMARY

The Proposed Development

This application is for the installation of electronic communications apparatus required for the Maritime & Coastguard Agency's (MCA) project to replace its radio communications network.

Telent Technology Solutions Ltd, an Electronic Communications Code Network Operator, has been appointed by MCA as its implementation partner to develop the infrastructure network throughout the United Kingdom.

The Benefits of the New Network

MCA is replacing its radio network to enable His Majesty's Coastguard to continue to save lives for years to come. The new network will be built and maintained by Telent Technology Services Ltd and is a significant investment in telecommunications infrastructure in rural areas. The programme will replace old existing copper telephone wiring, which is being withdrawn by BT, with modern fibre-based hybrid technology to each of the HM Coastguards 155 remote radio sites. New connection lines will also be added to increase resilience and diversity which will in turn improve the reliability of the radio network. The new network will ensure HM Coastguard can continue to:

- Communicate with ships in UK waters to advise on navigation hazards or receive distress alerts.
- Track shipping through ships' automatic identification systems, which presents a very significant national security risk.
- Launch and direct the hundreds of charitably funded lifeboats that save lives
- Communicate with HM Coastguard helicopters, fixed wing planes, and emergency tug which save lives and protect the marine environment.

Site Selection

Part of the replacement network will use microwave dish links where a fibre link is not viable. Transmission dishes are required at each end of the link to create the network. The proposed dishes need to be able to physically 'see' each other (known as 'Line-of-Sight' (LOS)), and therefore need to be clear of any obstacles such as trees, hills and building clutter. This is generally achieved by installing the proposed dishes on existing masts or buildings. The proposed microwave links will utilise existing MCA structures where possible and other existing sites owned by third party infrastructure providers if required. Where necessary new sites will be proposed to meet network requirements.

The location of the site is determined by the following factors:

- The need for LOS to the corresponding A-ends of the communications links
- The terrain in which the base station will be located and the height of any potential blockages, such as trees or buildings, nearby
- Proximity to a power source
- An accessible route for construction and future maintenance access
- Feasibility of providing the Ground Based Transmission network

In assessing these various requirements and looking to find an appropriate balance between operational and environmental factors, a sequential approach to site selection has been adopted. Site sharing, utilisation of existing buildings and structures have been explored, however, ultimately the need for the installation of a new ground based mast has been justified, in order for the proposal to best meet the operational need whilst minimising environmental impact. The proposed site will be located within the grounds of the existing fuel station, adjacent the existing BT telecommunications exchange. The proposed 4.0-meter-high mast will be of a similar appearance to the adjacent vertical structures, however, will be smaller in size.

Alternative Site Assessment

Paragraph 295 of the Scottish Planning Policy, in which the Government's supportive stance towards developing high-quality communications infrastructure is laid out, sets out the hierarchy approach and options to be considered when selecting sites and designing base stations. Paragraph 299 goes on to state that *'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'*.

In addition to this, the Code of Best Practice (2022) sets out the options for the siting and design of communications equipment. It explains that *"planning policies and decisions should support the expansion of wireless communications networks, including next generation mobile technology. Planning authorities, and those who represent rural areas, should recognise the importance of access to reliable mobile broadband and services for those who live and work in rural communities, including coverage for the emergency services network. The benefits of high-quality wireless connectivity to the rural economy are far reaching - better wireless infrastructure will give rural communities greater choice and access to services, allow businesses to grow, and have positive impacts on healthcare, education, tourism, and remote working."*

The Code then goes on to state that *"The government's objective is to deliver high quality, reliable wireless infrastructure whilst ensuring the impact of new network development is kept to a minimum. The siting and design of wireless network infrastructure is central to achieving this. Good siting and design principles should apply to all wireless network development and take into account any site-specific considerations and context. Both can create better places in which to live and work and help make development acceptable to communities"*.

Given the operational requirements in this instance in that the Maritime & Coastguard Agency's (MCA) project is required to replace its radio communications network, then siting is therefore limited and it is considered that the requirement for a new installation has been justified in this instance, as there is no existing structure capable of accommodating the additional loads associated with the proposal and overall communication network improvements for the Maritime & Coastguard Agency's (MCA)

project, meaning that a new site is required. To this end, the proposed standalone monopole has been located as close as it possible to similar existing vertical infrastructure, which would ensure it would not be viewed as being overly visually prominent or incongruous within the established landscape setting.

Pre-Application Engagement

Due to the size, scale and location of the proposed equipment, it was not thought that pre-application engagement with the Local Planning Authority was required in this instance, however, attempts were made to engage with local stakeholders via E-Mail correspondence issued on 15/02/2024, including Bernera Community Council, and Ward Councilors for Ward 06: Sgir' Uige Agus Carlabhagh (Councilor's Alasdair R Fraser and Norman Misty Macdonald).

Unfortunately, no consultation responses were received from any of the local stakeholders at this pre-application stage and therefore, the application is being submitted irrespective of community input at this stage.

Compliance with Planning Policy and other Material Planning Considerations

Policy at national level is set out within the National Planning Framework 4 (NPF4) and Scottish Planning Policy (SPP). The SPP views high quality communications infrastructure and systems as helping to achieve sustainable development objectives. Additionally, the Scottish Government's *Planning Guidance: Digital Telecommunications* (2023) gives advice on the process of site selection and design and illustrates how the equipment can be sensitively installed.

At local level, relevant policy within the Outer Hebrides Local Development Plan (2018) have been taken into account. This document is very supportive of new communications infrastructure, and recognises the importance of digital connectivity for social, economic and civil resilience and is supportive of the infrastructure roll out plans of digital communications operators, community groups and other organisations. A sensitive approach has been adopted to ensure an appropriate balance has been struck between operational and environmental considerations to result in a development that is

acceptable in all respects. In addition, the fact that the development is part of a programme being specifically required by Government in the wider public interest must carry great weight as a material consideration.

Although this framework might constrain conventional forms of development, it well understood that existing communities must be served by the infrastructure essential to a modern society. A sensitive approach has been adopted to ensure an appropriate balance has been struck between operational and environmental considerations to result in a development that is acceptable in all respects. In addition, the fact that the development is part of a programme being specifically required by Government in the wider public interest must carry great weight as a material consideration.

Although this framework might constrain conventional forms of development, it is well understood that existing communities must be served by the infrastructure essential to a modern society. The sensitive and balanced approach towards siting does however mean that all reasonable steps have been taken to minimise any perceived visual and environmental impact, whilst still providing the necessary radio connectivity for MCA.

ICNIRP Compliance

The proposed antennas comply with all relevant health and safety requirements, in accordance with ICNIRP guidelines. A certificate of compliance has been provided with this application.

Servicing and Maintenance

Periodic access will be required to the site for maintenance and servicing visits. This will be restricted to authorised personnel only, and therefore the proposal does not give rise to any issues associated with public access.

In conclusion, the proposed development has been sited and designed with reference to pre-application consultation in order to locate the development as sensitively as practicable. Specific consideration has been given to technical requirements and national and local planning policy. The proposal is part of an important Government

initiative and is supported by both local and national planning policy. Having regard to all the relevant material considerations the proposal merits support and the application should be permitted, in accordance with the presumption in favour of sustainable development.

1. INTRODUCTION

- 1.1 This statement is submitted in support of the application made in respect of development proposed at Great Bernera Fuel Station, Breaclete, Great Bernera, HS2 9LT, as part of replacement MCA Radio Communications Network.
- 1.2 As shown in detail in the drawings submitted, the proposal entails the installation of a proposed 4.0-meter-high monopole accommodating proposed dish link equipment, along with ancillary equipment. In this case, a new ground based installation is required to accommodate one end of a microwave link.
- 1.3 Telent Technology Solutions Ltd is an Electronic Communications Code Operator. The Electronic Communications Code is found at Schedule 2 of the Telecommunications Act 1984, as amended. However, in this instance this an application for prior approval determination is submitted and sought.

2. THE REQUIREMENT

2.1 The Maritime and Coastguard Agency (MCA) is replacing its radio network to enable His Majesty's Coastguard to continue to save lives for years to come. The new network will be built and maintained by Telent Technology Services Ltd and is a significant investment in telecommunications infrastructure in rural areas. The programme will replace old existing copper telephone wiring, which is being withdrawn by BT, with modern fibre-based hybrid technology to each of the HM Coastguards 155 remote radio sites. New connection lines will also be added to increase resilience and diversity which will in turn improve the reliability of the radio network. The new network will ensure HM Coastguard can continue to:

- Communicate with ships in UK waters to advise on navigation hazards or receive distress alerts.
- Track shipping through ships' automatic identification systems, which presents a very significant national security risk.
- Launch and direct the hundreds of charitably funded lifeboats that save lives
- Communicate with HM Coastguard helicopters, fixed wing planes, and emergency tug which save lives and protect the marine environment.

2.2 Part of the replacement network will use microwave dish links where a fibre link is not viable. Transmission dishes are required at each end of the link to create the network. The proposed dishes need to be able to physically 'see' each other (known as 'Line-of-Sight' (LOS)), therefore need to be clear of any obstacles such as trees, hills and building clutter. This is generally achieved by installing the proposed dishes on existing masts or buildings. The proposed microwave links will utilise existing MCA structures where possible and other existing sites owned by third party infrastructure providers dishes if required. Where necessary new sites will be proposed to meet network requirements.

Site Selection

2.3 The location of each end of the transmission link is selected after taking into account the following considerations,

- The need for a LOS to the corresponding A-end of the communications link
- The terrain in which the base station will be located and the height of any potential blockages, such as trees or buildings, nearby
- Proximity to a power source
- An accessible route for construction and future maintenance access
- Feasibility of providing the Ground Based Transmission network

2.5 The proposed site is located within the grounds of the existing Great Bernera community fuel station. The site is located to the south-west of the existing community fuel pump hut, on an area of ground that overlooks the coastline to the west. The existing vertical structures provided by the nearby existing lighting columns provide appropriate vertical and visual context in this instance, of which the mast will be viewed against from short and long views. Furthermore, there is an existing telephone exchange a short distance to the east, on the other side of the road from the proposed siting, with an existing monopole mast with similar dish infrastructure installed that sets the precedent for telecommunications development in this location. Unfortunately, whilst the option of site sharing and/or upgrading the existing mast was explored, it was confirmed by BT's design technicians that neither of these possibilities were feasible due to technical requirements of the existing mast, hence the requirement for a new structure. Height has also been limited to operational requirements, with the proposed height the lowest possible in order to ensure a direct line-of-sight can be achieved. It should be recognised that irrespective of the installation's use adjacent an existing communications base station, the introduction of a new structure within a particular environment will always be, to some degree, a noticeable addition to the landscape. However, it should be appreciated that the visibility of a development or its location within its immediate context does not automatically result in an overwhelming adverse harm occurring. Indeed, the

fundamental principle applied by the applicant is always to minimise the contrast between the communication equipment itself and its surroundings through where practicable appropriate siting and design.

- 2.6 Our conclusion is that the best balance between environmental and operational considerations is provided by using a specially designed structure at the application site. This is the reason for the application before you.
- 2.7 It is considered that the requirement for a new installation has been justified in this instance, as overall communication network improvements are essential for the Maritime & Coastguard Agency's (MCA) project, meaning that a new site is required. To this end, the proposed small, standalone slimline mast has been located adjacent to an established built environment and near to existing vertical structures, which would ensure it would not be viewed as being overly visually prominent or incongruous within the established landscape setting. As the equipment will stand at a height of 4.5-meters it will be smaller than the adjacent existing lattice tower and will be screened partially by the existing adjacent building. The visual impact of the of the proposal will be minimal in this instance while providing Line-of-sight connectivity.

3. COMPLIANCE WITH PLANNING POLICY

3.1 This section sets out the most relevant national and local planning policy concerning the proposed development.

3.2 The relevant planning policy framework that has been taken into account and in part already alluded to is found principally within:

- The Development Plan, which in this instance comprises:
 - National Planning Framework 4 (NPF4)
 - Outer Hebrides Local Development Plan (2018)
- Scottish Planning Policy (SPP)
- Scottish Government Planning Guidance: Digital Telecommunications (2023)

3.3 Under Section 25 of the Town and Country Planning (Scotland) Act 1997, the determination of planning applications are to be made in accordance with the Development Plan unless material considerations indicate otherwise. National Planning Framework 4 was formally adopted on the 13th of February 2023 and is now part of the statutory Development Plan. NPF4 provides the national planning policy context for the assessment of all planning applications. The adopted Outer Hebrides Local Development Plan (2018) and associated Supplementary Guidance continue to be part of the Development Plan. In the context of the material considerations relevant to this application there would be no areas of conflict between the overarching policy provisions of the adopted NPF4 and the adopted Outer Hebrides Local Development Plan.

3.4 These documents provide the overall policy background for electronic communications development, site specific policies and the key considerations relevant to the siting and design of appropriate electronic communications development.

The National Planning Policy Context

3.5 The general policy context can be summarised as follows:

- Government policy within the SPP is to support high quality communications infrastructure and systems – this is especially relevant to the MCA Network, which is a government initiative
- Government policy is to keep the inevitable environmental impact associated with electronic communications development to a minimum
- The best way to minimise environmental impact is to avoid the unnecessary proliferation of new radio masts and sites
- The starting point for planning new networks or the expansion of existing networks is therefore to use existing electronic communications sites
- Where new installations are required, as in this case, operators should look to develop well designed structures, such as those designed to blend in with the street scene or local setting

3.6 Scottish Planning Policy (SPP) and the National Planning Framework 4 (NPF4) superseded NPPG 19. This document condenses the advice outlined previously although the broad principles of promoting the expansion of electronic communications networks remains the same:

National Planning Framework 4 (NPF4)

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

- 3.8 Part 1– sets out an overarching spatial strategy for Scotland in the future. This includes priorities, spatial principles and action areas. This should be used to guide the preparation of regional spatial strategies, local development plans and local place plans. The strategy is relevant to wider policies and strategies relating to land use. It also sets out aspirations to stimulate green prosperity, stating that natural assets and environmental quality underpin the area’s main economic sectors and must therefore be protected, restored and used sustainably. A flexible approach to planning will help to attract investment, grow and diversify businesses and enable local entrepreneurship, micro enterprises, self-employment and social enterprises to flourish. Remote working can be capitalised on to build economically active local communities. The Plan acknowledges that achieving these aspirations will require the continued roll out of high-quality digital infrastructure and maintenance and decarbonisation of transport routes to wider markets.
- 3.9 Part 2– sets out proposed national developments that support the spatial strategy.
- 3.10 Policy 14 relates to design, quality and place. It aims to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

Policy 14 states:

- a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.

- 3.11 Part 3– sets out policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part should be taken as a whole, and all relevant policies should be applied to each application.
- 3.12 Part 3 is also a ‘Planning Policy Handbook’ and covers the following themes:

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

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

3.14 Policy 24 relates to 'Digital Infrastructure' and states:

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

- the visual and amenity impact of the proposed development has been minimised through careful siting, design and where appropriate landscaping;
 - it has been demonstrated that all practicable options and alternative sites have been considered, including the possibility of using existing masts, structures and buildings and/or site sharing;
 - there is no physical obstruction to aerodrome operations, technical sites or existing transmitter/receiver facilities.
- e) Development proposals that are likely to have an adverse effect on the operation of existing digital infrastructure or on the delivery of strategic roll-out plans should not be supported unless appropriate mitigation measures can be provided.

Scottish Planning Policy 2014 (SPP)

- 3.15 Scottish Planning Policy published in June 2014, is a statement of Scottish Government policy on how national important land use planning matters should be addressed across the country. SPP is supplemented by a series of Planning Advice Notes (PANs).
- 3.16 Paragraphs 292 – 300 of the SPP relates specifically to Supporting Digital Connectivity, including telecommunications developments. It highlights the importance of our digital infrastructure, across the whole of Scotland, including urban and rural areas and confirms that Scotland's economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.
- 3.17 The proposed development accords with all these aspects of the NPF4 and SPP in that it will provide much needed mobile coverage to the MCA in this location, bringing a range of associated economic and technical benefits to the wider rural area.
- 3.18 Paragraph 295 of the SPP confirms that Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment.

They should ensure that the following options are considered when selecting sites and designing base stations:

- mast or site sharing;
- installation on buildings or other existing structures;
- installing the smallest suitable equipment, commensurate with technological requirements;
- concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and
- installation of ground-based masts.

3.19 When considering Para 295, as highlighted previously, the proposed site represents the most appropriate planning option in this instance, in order to provide continued and improved coverage to the MCA in an area which has limited existing coverage and infrastructure. The proposed height in this instance is the minimum required in order to ensure the operational efficiency and network requirements in order for LOS to be achieved between the proposal and the closest additional link that forms part of the replacement MCA network being deployed as part of the Government Initiative. The proposal will see the mast having a similar finish and appearance to similar forms of telecommunications development within rural areas, such as that of the application site. As such, on balance the proposal represents the best operational and technical solution in this instance, while factoring relevant material planning considerations.

3.20 Paragraph 296 confirms that *“Local development plans should set out the matters to be addressed in planning applications for specific developments, including:*

- *an explanation of how the proposed equipment fits into the wider network;*
- *a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;*
- *details of the design, including height, materials and all components of the proposal;*
- *details of any proposed landscaping and screen planting, where appropriate;*

- *an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;*
- *a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation¹³¹; and*
- *an assessment of visual impact, if relevant.*

3.21 It is considered that the proposal has address all matters set out in the ‘model’ telecommunications policy as above. The proposal would result in development that would fit in with the overall site context, not be viewed as being visually incongruous and will not cause any undue harm when viewed from outlying areas. The proposed development will have no significant detrimental or demonstrable effect on the character and appearance of the existing site or indeed its setting when considering the immediate and surrounding locale.

3.22 In assessing applications for telecommunications development, paragraph 298 of the SPP confirms that *“Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy”*.

3.23 The height and equipment proposed will provide an essential improvement to the MCA communications network coverage within the immediate and surrounding locale, as part of the ongoing government project to provide the necessary infrastructure to allow for emergency communications

3.24 Paragraph 299 then states that. *“All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. The cumulative visual effects of equipment should be taken into account”*.

- 3.25 The scheme has been designed to ensure that it not only meets the technical requirements of the wider MCA network project, but also fully considers the site context and any potential views from outlying areas. As with the existing fuel station site, the proposal would be seen in the context of the existing industrial infrastructure. Given the nature of the proposed works, along with the limited siting opportunities and inability for development to be pursued at any previously developed sites, it is considered that this proposal will not have an unacceptable impact on the overall character and appearance of the mast or surroundings.
- 3.26 Paragraph 300. States that *“Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation, and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration”*.
- 3.27 The proposal would be consistent with the aims of the SPP, particularly as the proposal is of a moderately small scale would see development on a site whereby there is existing built development.
- 3.28 The works would result in a proposal considered as being the least visually incongruous withing the immediate or surrounding landscape setting, and therefore, would in fact assimilate itself with its surroundings and represent a satisfactory standard of development in this instance. The proposed radio base station will support the redevelopment of the wider MCA network, which is a government initiative that aims to support emergency services communications. The provision of adequate and efficient infrastructure including telecommunications is seen as crucial for the economic, social and environmental sustainability of all parts of Scotland, including that of the MCA project as in this case.

Scottish Government Planning Guidance: Digital Telecommunications (2023)

- 3.29 The Digital Telecommunications guidance document published by the Scottish Government in December 2023 is not planning policy but should be read in conjunction with the National Planning Framework 4 (NPF4) and the Local development planning guidance and it may be a material consideration in planning application and appeal decisions. Additionally, the guidance, largely contained within Chapter 4 of the document, replaces Planning Advice Note 62: Radio Telecommunications, which previously help operators in providing the general siting and design principles for telecommunications.
- 3.30 The General Principles section broadly explains the factors that can affect site selection and design consideration, listing these as:
- *“terrain or topography affecting radio coverage and wireless radio transmission backhaul.*
 - *natural and historic environment considerations.*
 - *capacity in urban areas where the data usage is in high demand.*
 - *relationship with the landowner.*
 - *availability and cost of access to the site and a power connection.*
 - *availability of fibre to provide transmission links to the surrounding network.*
 - *potential need for additional equipment may be needed where there is no clear line of sight (LOS) as objects and obstructions in way can cause signal weakness, resulting in slow and unpredictable service.*
 - *radio frequency and compliance with ICNIRP (see paragraphs 4.6 and 4.7)”*
- 3.31 In this instance, the LOS requirements of the MCA replacement network are the most significant factor affecting site selection.
- 3.32 Although operators will aim to install apparatus providing the optimum radio solution, appropriate alternatives should also be considered. The Digital Telecommunications guidance document suggest that the most appropriate

approach should see operators, *“installing the smallest suitable equipment, commensurate with technological requirements. For example, for a new mast located on a public road, instead of a lattice mast with headframe and exposed antennas, a slimline pole with tightly packed antennas within a shroud may be preferred.”*

3.33 Furthermore, in the case whereby new ground based masts are required, the guidance explains that, *“there are many ways that the environmental, landscape and visual impact of a ground-based mast can be mitigated. These include:*

- ***placing a mast close to similar structures.*** *Visual impact can be lessened by siting masts in locations that already contain engineered forms and structures such as industrial and commercial premises or major road junctions where road signs, lamp posts and traffic lights are present.*
- ***placing a mast in or adjacent to existing trees,*** *which may include planting trees to help integrate it in the landscape. This option is likely to be more feasible in or near wooded areas. Care should be taken to avoid the unnecessary loss of existing trees and siting outwith the crown of the tree should be sought. In addition, it should be borne in mind that antennas would need to be located above the tops of the trees to operate effectively (with allowance of future tree growth for non-mature trees). NPF4 Policy 6 has an intention to protect and expand forests, woodland and trees, reflecting Scottish Forestry’s Control of Woodland Removal Policy.*
- ***where no visual screening is available,*** *slimline lattice masts may be the most effective design solution. Their light-permeable structure can help to reduce the visual mass and bulk of the development. Locations where the mast can be backdropped by topography in main views are preferred.*
- ***appropriate colouring*** – *for example, masts that are most often viewed against the sky, are best left with a galvanised finish or coloured pale*

grey. Against a wooded backdrop, colouring the equipment a matt green or brown colour could be more appropriate.”

- 3.34 In this instance, the development proposed is comparatively small scale, well sited adjacent similar vertical structures and well designed to mimic these vertical structures through the monopole style design at the lowest possible height that ensures operational efficiency, and so should be acceptable in every respect.
- 3.35 The proposed monopole would be very much viewed within the context of the existing and established site arrangement, ensuring that any impact is minimised as far as is practicable. The proposal would therefore be consistent with National policy guidance as set out above.

Local Planning Policies

- 3.36 For the purposes of Sections 25 and 37 of the Town and Country Planning (Scotland) Act 1997, as consolidated by the Planning etc. (Scotland) Act 2006, the development plan(s) relevant to this site is the Outer Hebrides Local Development Plan (2018).
- 3.37 Comhairle nan Eilean Siar Council does not have a specific telecoms policy, but Policy EI 10 is relevant. This, together with the Scottish Government Planning Guidance: Digital Telecommunications (2023) is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with the Digital Telecommunications guidance.

Policy Analysis:

Policy EI 10 Communications Infrastructure

- 3.38 *The Comhairle recognises the importance of digital connectivity for social, economic and civil resilience and is supportive of the infrastructure roll out plans of digital communications operators, community groups and other organisations.*

Opportunities for the provision of digital infrastructure to new homes and business premises should be explored as an integral part of development. This should be done in consultation with service providers so that appropriate, universal and future-proofed infrastructure is installed and utilised.

Proposals for new mast sites should be supported by:

- a) an explanation of how the proposed equipment fits into the wider network; and*
- b) a statement on alternative options considered including justification that mast sharing has been explored and the reasons why it is not suitable or possible; and*
- c) details of the design, including height, materials and other components of the proposal.*

In addition, an assessment of visual impact may be required for proposals close to housing, sited in sensitive landscapes or a National Scenic Area or where they may impact upon the setting of a Listed Building or Scheduled Ancient Monument or where this information is considered necessary to inform an assessment of the proposal.

The removal of redundant masts and equipment and restoration of the site will be a condition of planning consent.

Policy NBH1: Landscape

- 3.39 *Development proposals should relate to the specific landscape and visual characteristics of the local area, ensuring that the overall integrity of landscape character is maintained.*

The Western Isles Landscape Character Assessment (WI-LCA) will be taken into account in determining applications and developers should refer to Appendix 1 of this Plan for a summary of this guidance.

Development proposals should not have an unacceptable significant landscape or visual impact. If it is assessed that there will be a significant landscape or visual impact, the applicant will be required to provide mitigation measures demonstrating how a satisfactory landscape and visual fit can be achieved.

- 3.40 This proposed development at the site seeks to consolidate telecommunications infrastructure within this rural area by locating the proposal adjacent the existing BT telephone exchange site and telecommunications infrastructure located within, to ensure the scale and mass of the design is sympathetic to its surrounds (using a slimline support pole structure and minimizing the required height so far as is practicable), limiting visual impact on the wider character of the area and distance from sensitive receptors, yet retaining capacity to ensure that it would deliver the level of service needed in this location for the Coastguard Agency. In this regard the proposal would accord with the Development Plan and all other material considerations.
- 3.41 Scottish Planning Policy recognises that local communities must be provided with a range of facilities and services in all areas. This includes access to emergency services, including the MCA communications network. This would also be afforded significant weight in respect of the public benefit associated with the proposal when taking into consideration the requirements of Development Plan policies, where these benefits in requiring an upgrade to the existing MCA communications network as, in effect, an emergency service, would significantly outweigh any impact with regards to any adverse visual impact on the landscape quality at this location.
- 3.42 Whilst the infrastructure being deployed is essentially the same as were it a commercial development, the proposal in front of the Council is not a commercial development. We have provided supporting information as to the nature of this project which is a government project to provide the necessary infrastructure to allow for emergency communications. On this basis therefore, there are further operational and technical limitations to the project and this specific proposal than would otherwise be the case.

3.43 In summary, the sensitive way the development proposed has been conceived and brought forward accords with best practice and forms part of a national important infrastructure project to provide emergency communications services to the local area. It accords with the key policy objectives at national level, which are reflected in the relevant policies at local level. The development proposed is, therefore, acceptable in principle and also accords with the more detailed guidance expressed in local policy.

4. DESIGN AND ACCESS CONSIDERATIONS

- 4.1 The development proposed is categorised as a local development and so exempt from the requirement to provide a Design Statement under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013.
- 4.2 However to assist your determination we explain the design principles and concepts that have been applied to the development, including the policy or approach adopted to the design and locational context and where relevant any consultation that may have been undertaken.
- 4.3 In bringing forward the proposal and suitable design, the relevant planning policy framework that has been taken into account and is found principally within the Council's Development Plan, Scottish Planning Policy, and the Scottish Governments Planning Guidance on Digital Telecommunications. In terms of design, consideration has been given to the main issues (where relevant) as identified within Chapter 4 of the Digital Telecommunications guidance document. The significant contribution such development makes towards sustainability objectives have already been outlined earlier.

Physical Context

- 4.4 The proposed site is located adjacent to the community fuel station and across the road from the BT telecommunications exchange, which hosts an existing telecommunications monopole mast. The existing tower cannot be used in this instance to support the proposed equipment due to it not having sufficient structural capacity to do so. Furthermore, it was confirmed by BT's design technicians that the possibility of replacing the existing mast and site sharing was not appropriate in this instance due to future technical requirements of the existing mast. In this regard, by deploying a new structure within the general locale of the existing tower, the visual impact is minimised in the area. The proposed height of the new structure has also been limited to operational requirements. It should be recognised that irrespective of the installation's use as

a communications base station, the introduction of a new structure within a particular environment will always be, to some degree, a noticeable addition to the landscape. However, it should be appreciated that the visibility of a development or its location within its immediate context does not automatically result in an overwhelming adverse harm occurring. Indeed, the fundamental principle applied by the applicant is always to minimise the contrast between the communication equipment itself and its surroundings through where practicable appropriate siting and design, which in this instance is in a location whereby such infrastructure has been considered acceptable by the council.

Design Concepts and Principles

- 4.5 The scale, layout and design of the development has been guided by the special technical and operational factors affecting the need to provide an acceptable level of coverage to the local area, having regard to the need to minimise visual impact, which have been explained in the previous sections of this statement.
- 4.6 The height of the mast, the numbers of antennas and their size, is the minimum amount of development required to provide coverage connectivity for the MCA network. The structure, a monopole, is the preferred design solution and has been chosen due to its slimline and minimal design. The design looks to present the optimum solution in terms of balancing environmental and operational considerations and meeting the visual expectation of the area.

Access Considerations

- 4.7 The proposed installation will be accessed via the existing layby that is currently used to access the community fuel station adjacent the location. There is no requirement to alter or add a new access road.
- 4.8 Once constructed, the development will be unmanned requiring only periodic visits about once every two to three months for routine maintenance and servicing. The site will be easy to access for this purpose and typical visits will be by an engineer that will be parked adjacent to the site.

Landscaping

- 4.9 In view of the nature of the development which already looks to best utilise existing infrastructure in order to ensure it is not viewed as being visually incongruous within the immediate landscape setting, a scheme of hard or soft landscaping is not considered necessary or appropriate in this case. The development is similar to other man-made utility and communication structures commonly found in such locations without and dedicated associate landscaping, including that of the existing mast as stated.

Appearance

- 4.10 The sensitive approach to siting and design should minimise the appearance of the development proposed. In addition, the existing (taller) manmade vertical structures located adjacent the proposal would ensure that the proposal is not viewed in isolation but part of the established setting within the locale. Insofar as the mast and equipment cabinet may be visible, they should look straight forward in appearance and reflect their function. To that extent they should in time become accepted features of the local environment as with other forms of communications networks and essentially public utility infrastructure.

5. ICNIRP COMPLIANCE

- 5.1 A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application. Accordingly, as explained within the SPP, it is not necessary, to consider further the health aspects and concerns about them, which include the perception of risk.

6. SUMMARY AND CONCLUSIONS

- 6.1 The proposed development forms part of a key link in the proposed replacement MCA communications network.
- 6.2 The use of the application site looks to provide the best balance between operational and environmental considerations. The site has been selected so that it can provide the necessary link to the nearest existing site. The design has been selected in order to have as little impact on the surroundings as possible. The design and appearance of the structure should, therefore, be acceptable. As stated, no existing structures can be utilized in this instance and so a new installation is justified.
- 6.3 This statement has demonstrated that the proposal is in accordance with national policy set out in the NPF4 and SPP and its detail complies with local policy objective set out within Policies EI10 and NBH1 of the Outer Hebrides Development Plan and the relevant supplementary guidance.
- 6.4 In conclusion, the development proposed fits with this outcome vision by allowing far better communications and more reliable connectivity for a key blue light service. As a project of national importance, ***this is a very strong material consideration in the determination of this application.*** The application merits support, and the critical requirements of the proposal would significantly outweigh any environmental impact in this instance.

Maritime and Coastguard Agency

Radio Network Infrastructure Replacement

The Maritime and Coastguard Agency is replacing its radio network to enable Her Majesty's Coastguard to continue to save lives for years to come. The new network will be built and maintained by telent Technology Services Ltd. and is a significant investment in telecommunications infrastructure in rural areas.

The programme will replace old existing copper telephone wiring, which is being withdrawn by BT, with modern fibre-based hybrid technology to each of the HM Coastguards 155 remote radio sites. New connection lines will also be added to increase resilience and diversity which will in turn improve the reliability of the radio network.

The new network will ensure HM Coastguard can continue to:

- Communicate with ships in UK waters to advise on navigation hazards or receive distress alerts.
- Track shipping through ships' automatic identification systems, which presents a very significant national security risk.
- Launch and direct the hundreds of charitably funded lifeboats that save lives
- Communicate with HM Coastguard helicopters, fixed wing planes, and emergency tug which save lives and protect the marine environment.

If you would like to know any more information about this programme or have a question, please contact the Maritime Coastguard agency by emailing: RNIR.Programme@mcga.gov.uk, or call 07342 055644.

