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Our ref: 1123

Tweedsmuir Community Council  
C/o Mr Gavin Parker  
Polmood Lodge  
Tweedsmuir  
ML12 6QN

Email: [tweedsmuirsecretary@outlook.com](mailto:tweedsmuirsecretary@outlook.com)

**Via Email**

02 February 2022

Dear Mr Parker,

**PRE CONSULTATION – PROPOSED RADIO BASE STATION INSTALLATION AT 1123 LAND AT SILVER JUBILEE ROAD, TWEEDSMUIR, ML12 6QP, NGR E: 310000 N: 622655.**

Clarke Telecom Ltd act on behalf of the mobile telecommunications operator Hutchison 3G UK Limited (**Three**).

The proposal is part of the Government backed scheme called Shared Rural Network (SRN). It is a collaboration between the Mobile Network Operators (MNO's) (Three, Telefonica and Vodafone) and the Government to improve 4G coverage for people living, working and travelling in poorly served rural areas.

The network will ensure geographic coverage from at least one operator to 95% of the UK by 2025, broadening consumer choice for a fast mobile broadband service in rural areas.

Three is in the process of identifying a suitable site in the Tweedsmuir area for a radio base station to significantly improve existing levels of service provision. The purpose of this letter is to consult with you and seek your views on their proposal before any planning submission is made. They understand that you are not always able to provide site specific comments, however, Three is committed to consultation with communities on their mobile telecommunications proposals and as such would encourage you to respond.

As part of Three's network improvement program incorporating Telefonica and Vodafone, there is a specific requirement for a new radio base station at this location to ensure that the latest 4G service provision in this area of Tweedsmuir. This ensures that the current mobile coverage 'gap' is filled in this rural location as part of the Shared Rural Network project.

Mobile telecoms networks are now ubiquitous throughout the UK. It is an expectation that an individual can connect and use their mobile phone whenever and wherever they are. However, there are many rural areas in the UK which are partial not spots. That is, there is only coverage with one mobile Network Operator. An installation in this location will ensure that 4G coverage is provided by the 3 MNOs Three, Telefonica and Vodafone. Thus this is shared infrastructure which is in full accordance with national planning policy. It will improve service whilst limiting the environmental impact through reduced proliferation, minimising the number of sites.

The SRN will deliver reliable 4G mobile connectivity allowing rural business to prosper and rural communities to thrive. The new infrastructure is guaranteed to bring mobile coverage and economic

benefits to areas of the UK currently missing out. This is even more significant in the post COVID economic recovery. High quality coverage promotes inward investment, creating jobs to assist in retaining skilled young people in rural areas.

The SRN will address the urban rural digital divide, delivering improved digital infrastructure to the areas that need it most. Social benefits include facilitating track and trace, being able to make contact with isolated or vulnerable friends or family and assisting in access to learning materials and remote learning. All of these benefits have never been more keenly felt than during the pandemic which highlighted the necessity and dependence on good mobile coverage.

Better connectivity has real, tangible benefits for people and businesses, such as booking GP appointments online, using apps to communicate with friends and family, boosting tourism and agriculture through platforms such as social media which is now an important marketing tool for businesses, access to emergency services etc. 4G can provide a means to connect to superfast broadband where fibre broadband is not yet available.

The Government recognises that widespread coverage of mobile connectivity is essential for people and businesses. People expect to be connected where they live, work, visit and travel. That is why the Government is committed to extending mobile geographical coverage further across the UK.

The preferred location for an installation is as follows:

**1123 LAND AT SILVER JUBILEE ROAD, TWEEDSMUIR, ML12 6QP, NGR E: 310000 N: 622655.**

The proposal relates to the installation of a 25m lattice tower supporting 9 no. antennas, 6 no. transmission dishes, 5 no. equipment cabinets, 1 no. meter cabinet and ancillary development thereto including a generator and fuel tank, access track and hard standing, gabion wall, a fenced compound and a GPS module.

This is a remote location with minimal mobile coverage at the current time. The site has been carefully positioned set against the backdrop of a copse of trees which are some 20m in height. In order for the whole of the antennas to clear the trees and reach the target coverage area a height of 25m is required. The trees ensure that much of this site will be screened minimising the prominence and visibility in the surrounding area and structure is proposed to be painted galvanised/ grey in order for the structure to blend in with the often grey sky. The location partly utilises existing access tracks and roads minimising hard standing required for any new access track that would otherwise be necessary.

A streetworks style column cannot be utilised as they are not able to structurally support the weight and size of 3 separate MNO's equipment to enable the operators to share the same structure. A number of masts would be needed, throughout this rural landscape. This would lead to proliferation and would have a much greater impact on the surrounding area. Such designs are also restrictive on the coverage that can be provided due to limitations in respect of the heights and bearings and therefore will not be able to provide the necessary coverage to this large rural area.

The more compromises on design the less effective the coverage is and the loss of the ability of the antenna signal to reach the target coverage area. No mast equals no service and thus no benefits.

A lattice tower is the most suitable design from a technical viewpoint, given the windloading in this area. Such a design is also able to facilitate greater coverage and provide the structural capability required to

be able to support the weight and size of three operators telecommunications equipment. Due to the slim line nature of the supporting struts of the lattice frame, light is able to continue to pass through the structure. If the lattice tower were to be any slimmer in width then it would not be structurally capable of supporting all the operators equipment or meet the windloading requirements in this windy location.

The transmission dishes are essential to link the installation back into the MNO's wider network and relay the data. The transmission dishes need a clear line of sight in order to function. As such they require a centre line height of 21.95m above ground level.

The equipment cabinets are relatively small and their proposed colouring of Fir Green (RAL 6009) they will not be overly noticeable in the landscape given their maximum height is 2.3m.

We have considered alternative site options and discounted as follows:

- **Existing Telecommunications mast – O2 Mast, Tweedsmuir , Scottish Borders, ML12 6QP, NGR E: 309359 N:623705**  
A site share on this existing mast is not likely to be viable due to it being on the outskirts of the search area set within lowland and unlikely to provide adequate coverage . This site has therefore been discounted for this reason.
- **Greenfield – Broad Law, Scottish Borders, ML12, NGR E: 314581 N: 623449**  
Broad Law ( 850m ) represents a site on higher ground however the site is over 5km from the nominal and within SSSI land so has been discounted.
- **Greenfield – Talla Reservoir, Tweedsmuir , Scottish Borders, ML12 6QP, NGR E: 310944 N: 623528**  
This site has been discounted as it has poor access via the forest and is approximately 3km away from the nominal on lower ground which will not provide adequate coverage.

The Local Planning Authority mast register and our records of other potential sites have already been reviewed, the policies in the Development Plan have been taken into account and the planning history of the site has been examined.

The proposal for this Three site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines. It takes into account the cumulative effect of the emissions from the proposed installation and all radio base stations present at, or near, the proposed location.

In order to give you time to send your comments or request further information, we commit to allow at least 14 days before an application is submitted to the Local Planning Authority. This 14-day period starts from the date at the top of this letter.

We would also be grateful if you could please advise of any local stakeholders or groups that might like to make comments. For your information pre-consultation letters and a set of plans have been sent to the local ward councillors for Tweeddale West Ward (Cllrs H Anderson, K Chapman and E Small), Tweedsmuir Community Council, the local MSP Christine Grahame, the local MP David Mundell, and planning officers at Scottish Borders Council.

We look forward to receiving any comments you may have on the proposal.



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Should you have any queries regarding this matter, please do not hesitate to contact me (quoting cell number 1123)

Yours faithfully

*joshua fiteni*

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(For Hutchison 3G UK Limited (Three))