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

1. Site Details

Site Name:	Opposite Jct. Fitzroy Road & Regent Park Road	Site Address:	Area of Footpath Regent's Park Road Swiss Cottage
NGR:	E528023, N183801		Camden London NW1 8UD
Site Ref Number:	CMN13532	Site Type:	Proposed 5G telecoms installation: 18m high Streetpole and 3no cabinets with ancillary works.

2. Pre-Application Check List

Site Selection

Was the Camden Council 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 in	nformation.	
Was the industry site database checked for suitable sites by the operator:	Yes	
If no explain why:		
N/a		

Pre-application consultation with Camden Council

Written offer of pre-application consultation:	N/a
Was there pre-application contact:	Yes
Date of pre-application contact:	09 th June 2020
Name of contact:	Local Planning Authority and Ward Members – by email

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 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 highspeed 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.

An e-mail was sent to the planning department at Camden Council on the 09th June last year. The communication included a set of planning drawings, site information sheet and an explanation behind the requirement for a new telecommunications installation. The ward councillors for the local area were also included within the communication. A response was subsequently received from one of the councillors who provided the following comments:-

"Thanks very much for your email and for this pre-consultation notice.

I do appreciate the need to install new masts for a better connectivity (and living in that area I also appreciate that this will bring direct benefit to myself), but I have to object very strongly to the installation of a stand alone mast on the pavement outside the park. This would be an eye-sore solution, totally unacceptable in the Conservation area.

I know that this site has been tested for various installation (last one for electric bike hangars) but it was always deemed inappropriate.

I appreciate the area is small, but I strongly recommend you to find an alternative and less visible solution (maybe on the roof of a building)."

The height of the installation was initially proposed at 20 metres and has since been reduced to a height of 18 metres. Furthermore and as shall be explained in more detail, a number of other locations have been investigated and discounted.

To the best of my knowledge, no formal response was received from the planning department in respect of the proposed scheme itself.

Ten Commitments Consultation

Rating of Site under Traffic Light Model:

Prior to the submission of this application, pre-consultation was initiated with the local planning authority, providing an opportunity to discuss the development proposal and identify any site-specific issues.

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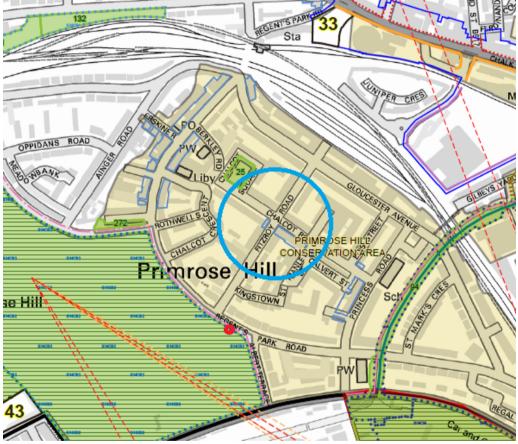
Summary of outcome/Main issues raised:

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 well as the objectives of the National Planning Policy Framework (February 2019).

Full details of the scheme are outlined within the planning drawings (CMN13532).

The target area is centred over Chalcot Road and Fitzroy Road, within the Primrose Hill Conservation Area. Please find below an extract of the intended target/search area which has been superimposed onto a map of the conservation area.

Approximate location of the intended target/search area is circled. The application site on Regent's Park Road is shown as a red marker.



As detailed above, the entire target/search area is situated inside this designated area, nevertheless and as explained later, the application site has been specifically selected to minimise visual impact upon the immediate and wider area, while at the same time, achieving the operational requirements of Hutchison 3G (UK) Ltd 'H3G'. As a result, H3G consider a 'Streetworks' installation positioned upon the adopted highway (pavement), is best suited to extend high-speed mobile coverage to the target community. The scheme is also considered to fit with the Local Authority's critical role in delivering the UK Government's Digital connectivity vision and provides a basis for Camden Council to support the request for plans to speed up digital infrastructure rollout, as outlined by Ministers on the 27th August 2020.

School/College

Location of site in relation to school/college:

No school or college identified within the immediate vicinity of the site.

Outline of consultation carried out with school/college:

N/a

Summary of outcome/Main issues raised:

N/a

Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation (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?	No
Details of response:	
N/a	

Developer's Notice

Copy of Developer's Notice enclosed?	Yes	
Date served:	14 th April 202	21

3. Proposed Development

The p	roposed	site:
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The proposed solution involves erecting a new 18m high H3G Phase 8 Street Pole installation upon the footpath adjacent to Regent's Park Road, Swiss Cottage, Camden, London, NW1 8UD, (E528023, N183801).

The technical details of this proposal are illustrated within the enclosed application design drawings:- CMN13532_Planning_Rev A. It is recognised that the very nature of installing new 5G communications infrastructure within a dense urban setting requires a well-measured balance between the need to extend practical coverage with the risk of increasing visual intrusion.

Three are in the process of building the UK's fastest 5G network and has 140MHz of 5G spectrum (and 100MHz of it contiguous), which means our service will be much faster and shall have the ability to handle more data. In making this technology available to customers, H3G will need to provide a mix of upgrades involving existing sites and the building of new sites. New sites will be needed for many reasons, including the higher radio frequencies used for 5G, which do not travel as far as those frequencies currently in use. In addition, not all existing sites will have the capacity of being upgraded.

The very nature of 5G and the network services it provides, means the equipment and antennas are quite different to the previous and existing, service requirements. In particular, the design of the antennas, and the separation required from other items of associated equipment, is such that we cannot utilise certain structures that provide an installation for another operator, most notably in a street works or highways environment.

The search process involved an initial 'desk-top' survey to ascertain and identify major constraints and impediments, followed by a physical search of the area. As with all 5G cells, this is an extremely constrained cell search area and options within the area are extremely limited. Nevertheless, the most viable solution that minimises amenity issues, has been put forward.

The site selection process has also been influenced by the topography of the area, buildings, trees, pavements and vertical elements of street furniture distributed around the vicinity of the site, including street lighting columns.

Regent's Park Road runs along the north eastern edge of Primrose Hill (park) and is home to a mix of residential flats and townhouses. The proposed site is situated upon a wide pedestrian pavement and backs onto Primrose Hill (park). The site is positioned adjacent to tall, mature trees and within proximity of existing street furniture. While the design itself is typical of street furniture found in such urban locations, particular care has been taken to ensure the location will have a minimal visual impact upon the many residential properties within the surrounding area, which the apparatus will ultimately serve. In particular, it is anticipated the adjacent trees will provide a significant level of screening, thus minimising any visual impact upon the surrounding residential dwellings.

The equipment is considered unlikely to have any material impact on the local area, however it should bring significant connectivity improvements, which is a material consideration in the judgment of the site suitability. The cell search area was assessed at the survey stage from the perspective of planning and residential amenity, while a detailed site evaluation in line with The Camden Local Plan (2017), has helped shape this application.

In this location, existing base stations are not capable of supporting additional equipment to extend coverage across the target area and prospective 'in-fill' mast sites are extremely limited. Other sites have been identified and subsequently discounted (Refer to Section 6, Figure 5). Notwithstanding, there is an acute need for a new telecommunications installation to deliver the required community coverage.

The cell search areas for 5G are very constrained, with a typical cell radius of 50 metres. In this particular instance, the search area is centred around Chalcot Road and Fitzroy Road. Due to the operational parameters of 5G, moving the search area or seeking locations a long way from the search area is generally not operationally feasible. The position of the target/search area is also governed by existing/live Hutchison 3G 'Three' sites within the wider locality. Details of the operational sites are outlined within Figure 4. No suitable locations could be identified within the target/search area itself and so the proposed site is positioned to the south east of target area. Further details are included within Section 6 of this document, along with other locations that have been discounted.

Due to the position of the site upon a wide pavement, the passing clearance that will be retained for pedestrians, the presence of nearby street furniture, including lamp posts, the setting against a number of tall, mature trees and nature of the equipment itself, which includes a free-standing telecommunications pole with associated ground-based cabinets, the application site is considered the single most appropriate location to support service delivery through an 18 metre Streetpole, with equipment cabinets typical of control boxes commonly found upon the adopted highway. The equipment will be positioned at the back of the pavement in a single line, to ensure there is no detrimental impact to pedestrians. Please note, the cabinet doors will also open 180 degrees, so the adjacent footpath will remain clear, even when the equipment is being serviced or maintained. It is anticipated around 1-2 visits will be required each year for this purpose.

The pole and cabinets will appeal grey in colour, however the equipment can be painted to the requirements of Camden Council.

Figure 1 - Site Photograph (view looking South West) from Regent's Park Road Aspect includes street furniture and trees



Figure 2 – Extract from Google Streetview (view looking South East) Near to the Junction of from the junction of Fitzroy Road

Aspect includes buildings, street furnuture and trees



Figure 3 - Extract from Google Streetview (view looking West) from Regent's Road (to the East of Albert Terrace)

Aspect includes buildings, street furniture and trees



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

Planning Policy Relevant to the Development Site:

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

The London Plan: The Spatial Development Strategy for Greater London (March 2021), Policies GG5, D3, D4 & SI 6

The London Plan: Spatial Development Strategy for London (GLA, consolidated with alterations since 2011, published March 2016) Policies 4.11, 7.4, 7.5 & 7.6

The Draft London Plan - Intend to Publish version (December 2019), Policies D1, D4, D8, T3, T4 & SI 6

Local Planning Authority: Camden Council

Local Plan: The Camden Local Plan (2017). No specific telecommunications policy has been identified, however the importance of digital infrastructure is recognised throughout the plan, including Policy E1 – Economic Development. Telecommunications is also detailed within Item 66 (Appendix 1: Infrastructure Table)

ltem No.	Infrastructure item / programme name	Project / programme description	Location	Delivery lead	Delivery period	Comments
66	Digital connectivity	Improved internet access through the acceleration of high speed connectivity, including public wireless systems.	Borough wide with a focus on where this maximises benefits for the community and business	LB Camden, GLA, BT Openreach and other industry partners	Plan period	Camden's Digital Strategy sets out a series of actions to support the uptake of high quality, next generation connectivity. This includes better connections for businesses and residents already on-line, tackling the 'digital divide' where people lack the confidence to use IT and the greater use of digital technology in delivering services.

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

In this instance, a new 18m high H3G Phase 8 Streetpole with associated 3no. equipment cabinets (colour Grey RAL7035) are to be positioned upon the adopted public highway (footpath), to reduce visual impact in a residential setting. For the reasons listed above, the proposed site and scheme is not considered to pose an undue onerous material consideration and favourable determination is invited.

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."

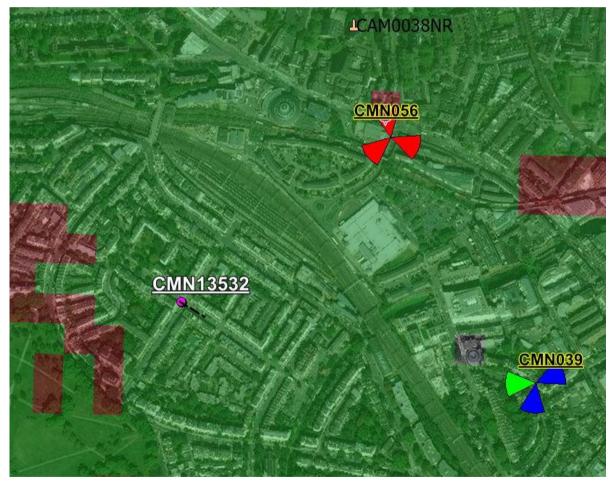
In keeping with the National Planning Policy Framework (NPPF) guidelines of using: "high quality communications" (Section 10), the proposed design has been selected to minimise visual impact upon the streetscape by integrating with the existing built environment.

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 CMN13532) and existing H3G (Three) UK sites are illustrated within Figure 4 below:

Figure 4 - Coverage Map: The proposed installation must be located close to reference CMN13532.



Type of Structure					
Description:					
Proposed Phase 8 Monopole c/w wrapround Ca	binet at base.				
Overall Height:		18m AGL			
Height of existing building N/a					
Equipment Housing:					
Length:		See drawings			
Width:	Width: See drawings				
Height:		See drawings			
Materials					
Tower/mast etc type of material and external colour: Phase 8 Monopole, colour Grey RAL7035					
Equipment housing - type of material and external colour:	Profile steel cladding, co	lour Grey RAL7035			

Reasons for choice of design:

The proposed installation is an H3G LTE (Three) Phase 8 Monopole which will support the UK Government Digital connectivity vision and provide a basis for support from Camden Council 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.

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. While it is appreciated the telecommunications pole will be larger in comparison to the surrounding lamp posts along Regent's Park Road and within the wider area, 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 some of the surrounding properties. Nevertheless, every effort has been made to keep the height of the pole to an absolute minimum (18 metres), while the equipment will benefit from screening in respect of the adjacent trees.

ICNIRP Declaration attached	Yes	
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 determining compliance, the emissions from all mobile phone network operators on the site are taken into account.		

5. Technical Justification

Reason(s) why site required

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 important to explain the positive technical justification for the site and how the facility fits into the overall network.

The site is required to provide new 5G coverage for H3G LTE, improving service in and around Regent's Road. As outlined above, the cell search areas for 5G are extremely constrained with a typical cell radius of approximately 50m. In general, it would not be feasible to site the installation too far from the target locale (please see Figure 5).

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

Discounted Options

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.

This sequential approach is outlined below:

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

In compliance with its licence and the sequential approach outlined in the 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.

The National Planning Policy Framework (NPPF) is clear that LPAs should not question the need for the installation under Part 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".

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 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 in Figure 5, together with site locations that were investigated and subsequently discounted.

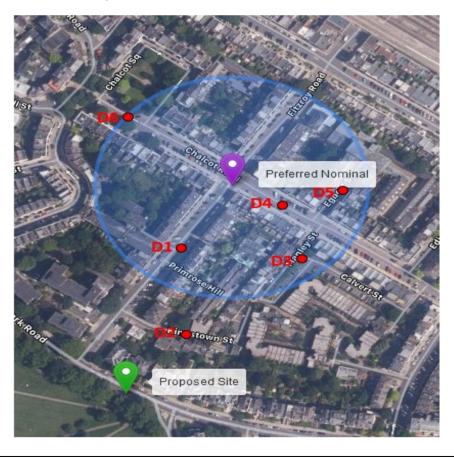
Discounted Options:

Site	NGR	Discounted Reason
D1 Fitzroy Road	E 528059, N 183939	Fitzroy Road is generally lined with 3-4 storey terraced flats and town houses that front onto the street. In addition, pavement space is somewhat limited due to the presence of building entrances and roadside parking. As a result, no suitable locations could be identified for a new telecommunications installation.
D2 Kingstown Street	E 528050, N 183860	Kingstown Street is overlooked by a number of flats and houses. In addition, the pavements are generally very narrow, while further space is taken up by vehicle parking areas. As a consequence, no suitable locations could be identified for a new telecommunications installation.
D3 Manley Street	E 528140, N 183921	The northern section of Manley Street (by the junction of Chalcot Road) is overshadowed by 3-4 storey town houses/flats. Notwithstanding the northern end of Manley Street, the pavements are generally very narrow while significant space is taken up by vehicle parking spaces.
D4 Chalcot Road	E 528126, N 183979	Chalcot Road is generally lined with 3-4 storey terraced town houses/flats that front onto the street. Pavement space is further limited due to the presence of building entrances, other street furniture and roadside parking. As a consequence, no suitable locations could be identified for a new telecommunications installation.

D5 Egbert Street	E 528179, N 183996	Egbert Street is generally lined with 4-5 storey terraced town houses/flats that front onto the street. Pavement space is further limited due to the presence of building entrances, other street furniture and roadside parking. As a consequence, no suitable locations could be identified for a new telecommunications installation.
D6 Chalcot Square	E 528013 <i>,</i> N 184056	Chalcot Square is generally lined with 4-5 storey terraced town houses/flats that front onto the street. Pavement space is further limited due to the presence of building entrances, other street furniture, trees and roadside parking. As a consequence, no suitable locations could be identified for a new telecommunications installation.
D7 Existing Mast infrastructure	N/a	Existing mast infrastructure approximately 0.4km to the north east and 0.49km to the south east of the search area. The installations are not capable of hosting additional equipment which could extend into this particular target area, where there is a gap in network coverage. As a consequence, the sites have been discounted.

Figure 5 - Proposed Site Location: 100m DSA (Desired Search Area) shown circled

Please note, the search area differs slightly from the pre-consultation correspondence. The search area was incorrectly centred around the application site itself, whereas the target/search area is positioned to the north east of the application site, around Fitzroy Road and Chalcot Road.



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 City of London and specifically in this instance, to enhance 5G coverage levels in and around Regent's Park Road, Camden.

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.

The proposed scheme has been designed to ensure the fundamental principles of good siting and appearance are adhered to. The overall impact of the installation on the environment is therefore considered limited when viewed in the context that high-speed mobile connectivity is the lifeblood of a Community.

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 10th November 2020 (Appeal Reference: <u>APP/A5840/W/20/3254830</u>).

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 18 metre-high streetpole 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 this particular instance, following an initial desktop survey and subsequent physical search of the intended target/search area, due to the characteristics of the area, the nature of the proposed equipment, location (wide pavement), existing street furniture and adjacent trees, after careful analysis, we believe the proposed site will minimise any visual impact upon the immediate and wider area, including the Primrose Hill Conservation Area. While we appreciate the application site is situated within the Conservation Area, the intended target/search area is centred around this designated area and the applicant (Hutchison 3G UK Limited) has an operational requirement to enhance communications within this part of Camden.

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, the Camden Local Plan (2017) and the Mayor of London Local Plan, particularly in respect of improving and enhancing communications within this part of the city, where communications are viewed as a vital ingredient for continued economic prosperity and social inclusion.

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)	Chris Weir BSc (Hons), MRICS	Telephone:	07450 982 496
Operator: Address:	H3G Dot Surveying, The Bonds (Suite 31), 2 Anderson Place, Edinburgh EH6 5NP	Fax no: Email Address:	N/A c.weir@dotsurveying.co.uk
Signed:	UMAU	Date:	14 th April 2021
Position:	Senior Surveyor	Company: (on behalf of above operator)	Dot Surveying