
Radio Transmitter Mast: Hunthill Estate, Angus

Planning Statement



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1. Introduction

- 1.1. Savills are applying for planning permission, on behalf of their client, Hunthill Estate, for the installation of a 10m height radio transmitter mast at approximately 3.7km north-west of Hunthill Lodge, Hunthill, Glen Lethnot, Brechin, DD9 7UR. Please see Figure 1 below showing the site area in red and its wider context.
- 1.2. The site area is upland rural land and can be accessed via existing hill tracks. Please refer to location Plan 1, 2 and 3 accompanying this application for further information on the location.
- 1.3. As mentioned, the proposal is for the installation of a radio mast at 10m high, with additional hardware including two solar panels and a GRP box.
- 1.4. The purpose of this statement is to provide the planning authority with the necessary supporting information it requires to help determine this application. Accordingly, this statement seeks to set out in a logical manner all matters that may be relevant as part of that determination, in addition to the submitted plans and graphical information already being considered by Angus Council.



Figure 1 - Wider Context Plan - site shown circled in red

2. Background

- 2.1. Hunthill Estate and Tuillybardine farms operate over 17000 acres of land around Glen Lethnot. There is no mobile telephone coverage with the exception of very small areas, and currently radio coverage on the land is from hand held or vehicle mounted radios.
- 2.2. Each member of staff is provided with a communications radio within their work vehicle and a separate hand held radio for use outside the vehicle. This is the only means of communication to other staff members and onwards to emergency services, when on the hill.
- 2.3. Farm and estate staff work frequently on their own for extended periods of time and at considerable distance (sometimes several miles) from any other employee or occupied premises. There are over ten employees on the estate who are at risk from lone working and being unable to maintain radio contact. In order to address this significant Health & Safety risk of employees having an accident or incident and not being able to contact anyone for assistance, the Estate proposes to construct a radio mast to provide communications radio coverage to current 'black spots' which are extensive across the landholding.
- 2.4. The location for this mast was chosen on the advice of the radio communications provider to maximise coverage (although some black spots remain) whilst also selecting a site which will not be in direct visual line of site from the Glen Road.

3. Details of Proposal

- 3.1. The proposed development will comprise the installation of a 10m height grey steel radio transmitter mast with two solar panels and a GRP box. Please refer to the Block Plan and General Arrangement drawings submitted with this application.
- 3.2. The lattice tower measures 6m and the transmitter extends to 4m on top of the lattice tower, so the mast reaches a height of 10m from top of base to ground level. The base is of concrete material with a finished level 150mm above ground level.
- 3.3. The solar panels are south-facing and located at the bottom of the mast at ground level. They reach a height of approximately 1.6m.
- 3.4. The GRP box is located on the north facing elevation and reaches a height of 1.2m. The GRP box façade will be a landscape green colour. The box will be lockable and will house the control equipment required to operate the mast.
- 3.5. The mast, solar panels and GRP box will be secured to a concrete plinth, 2.8m in length. Sensitive construction methods will be employed to ensure land surrounding the site is undisturbed.
- 3.6. Mindful of the visual impact and the desire to reduce the visual impact of the structure, careful consideration has been given to the external appearance of the proposal with neutral colours (grey and green) being proposed. Furthermore, careful consideration was given to the siting of the proposed mast in terms of the impact of any new structure on the landscape, with sites being evaluated for not only location and accessibility, but also for their ability to minimise landscape impact.
- 3.7. In terms of visibility, the closest straightline dwellinghouse is 3km away. Furthermore, those living in Hunthill lodge, located at the bottom of the hill, won't be able to see the mast due to tree coverage and topography. Similarly, due to a lack of public roads, the mast will likely not be seen by passers-by. The only people that will potentially see the mast are the Estate workers who are expected to welcome the proposals to improve their Health and Safety at work and potential hill walkers.
- 3.8. Overall, it is considered that the proposed radio mast and ancillary equipment is of a size, design, and landscape fit that is commensurate with its function and setting.

4. Policy Analysis

- 4.1.1. Commentary on the policy context for radio masts as considered by Savills, at both national and local levels is presented below.
- 4.1.2. The national context for such developments in the countryside is that planning policies at all levels are generally positive, and that Local Development Plan policies are regarded as the most appropriate level to inform decision making.

4.2. Development Plan Context

- 4.2.1. Under Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended), the determination of planning applications is to be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan does not include either the National Planning Framework for Scotland 3 (NPF3 (2014)), or the current Scottish Planning Policy (SPP (2014)), which do not have the status of Development Plan for planning purposes. This will change when the next National Planning Framework (NPF4) is published incorporating a new SPP. This consolidated document will have the status of the Development Plan for planning purposes. This will mean that its policies will have a stronger role in informing day to day decision making. A final version of NPF4 is currently anticipated in 2022.
- 4.2.2. The Development Plan for this area therefore currently comprises Tayplan 2016-2036 (2017) and the Adopted Angus Local Development Plan (LDP (2016)). Any planning application for a radio mast such as this will therefore need to be assessed in light of relevant Development Plan policies.

4.3. Tayplan 2016-2036 (2017)

- 4.3.1. The principal purpose of Tayplan as set out on page 3 of the document is to set out the overall planning vision for the Perth and Dundee area over the next 20 years. To this end, the document is largely silent on matters that relate to small-scale rural developments and focuses on strategic developments.
- 4.3.2. Policy 1 'Location Priorities' does reference the countryside under part C 'Outside of Settlements' however. This policy notes that "*proposals for development in the countryside should be assessed against the need to avoid suburbanisation of the countryside and unsustainable patterns of travel and development*"
- 4.3.3. There are considered to be no other policies of direct relevance to development in the countryside within Tayplan.

4.4. Angus Local Development Plan (LDP) (2016)

LDP Vision and Strategy

- 4.4.1. The adopted LDP notes an approach to rural development in its strategy section on pages 8 and 9. As background it stresses that *“the LDP aims to maintain diversity (in rural areas) by supporting new development in appropriate locations and by encouraging people to live and work in rural communities”*.
- 4.4.2. We consider this proposal is helping to meet this objective by improving the working conditions of the Estate with the aim to retain employees for a number of years and continue to contribute to the rural economy.
- 4.4.3. It further clarifies on page 9 that rural areas have been split into those considered category 1 rural settlement units, and category 2 rural settlement units. The proposals map that accompanies the written plan clearly shows that the application site is in a category 2 area. The LDP notes in this regard that *“in Category 2 areas (which are remote rural areas), the emphasis will be on maintaining and growing communities by encouraging diversity in the rural economy”*.

Policy DS1 ‘Development Boundaries and Priorities’

- 4.4.4. In addition to the strategic approach explained on pages 8 and 9, the adopted LDP also contains a number of policies that are relevant to this application. The first of these is policy DS1 ‘Development Boundaries and Priorities’. This notes that for application sites such as this the following principle will apply: *“Outwith development boundaries, proposals will be supported where they are of a scale and nature appropriate to their location and where they are in accordance with relevant policies of the ALDP”*.

Policy PV4 ‘Sites Designated for Natural Heritage and Biodiversity Value’

- 4.4.5. Development proposals should not result in adverse impacts, either alone or in combination with other proposals or projects, on the integrity of any European designated site, in accordance with Policy PV4 Sites Designated for Natural Heritage and Biodiversity Value.
- 4.4.6. The proposal sites exists within a ‘Special Protected Area’ known as the ‘Cairngorms Massif’ as shown below on the Nature Scot website.

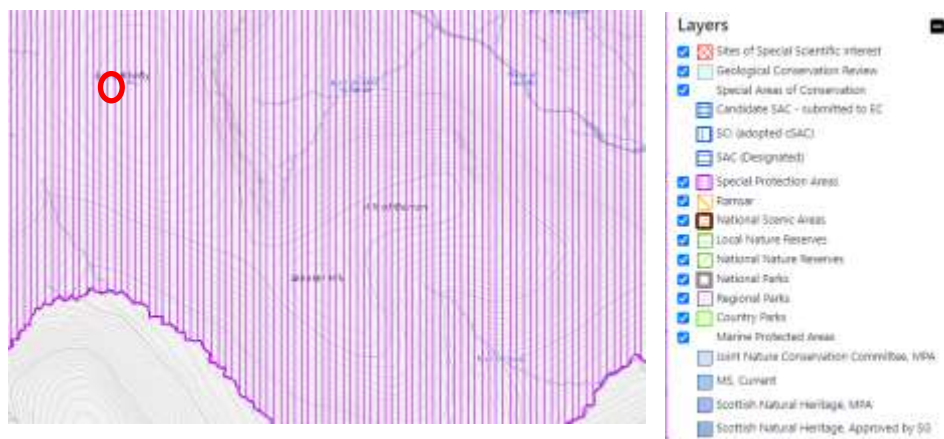


Figure 2 - Special Protection Area, NatureScot

4.4.7. Policy PV4 states that “Development proposals or land use change which alone or in combination with other proposals could have a significant effect on a Ramsar site or a site designated or proposed under the Birds or Habitats Directive (Special Areas for Conservation and Special Protection Areas) and which is not directly connected with or necessary to the management of the site, will only be permitted where:

- an appropriate assessment demonstrates the proposal will not adversely affect the integrity of the site; or
- there are no alternative solutions; and
- there are imperative reasons of overriding public interest, including those of social or economic nature; and
- compensatory measures are provided to ensure that the overall coherence of the Natura Network is protected”

4.5. We consider that direct impacts on the Special Protection Area will be negligible. The radio mast is only 10 metres high, which is considered to be relatively short in comparison to other radio transmitter masts and it should not cause any direct negative effects on residential or public amenity. Furthermore, this location was chosen to minimise visual impact from the glen road whilst maximising coverage of the radio network.

Policy TC13 ‘Digital Connectivity and Telecommunications Infrastructure’

4.5.1. Policy TC13 ‘Digital Connectivity and Telecommunications Infrastructure’ is the overarching policy principle for this proposal. This policy has a criteria set out which proposals need to be met. These are analysed in the table below:

Policy Criteria	Fit with Policy
The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;	We consider the proposal to be of a design and scale common for such developments and it is necessary to support the delivery of the required coverage improvements. As mentioned, the proposed mast is located in an upland rural area which doesn’t impact on any residential amenity. For information, the nearest straightline dwelling house is 3km away. Estate workers and walkers may be able to see the mast however we consider that the neutral external colours used on the design help to minimise visual impact and due to the rolling upland nature of the land, it may only be seen from certain aspects. Whilst the mast would be visible from some public areas, the visual impact would not be untypical of that associated with other masts found in urban areas or on the fringe of settlements
If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;	Not applicable to this application.

<p>If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the planning authority</p>	<p>The proposed location was chosen to minimise visual impact from the glen road whilst maximising coverage of the radio network.</p>
<p>If the proposed location is within a sensitive area or on a sensitive site or building, such as areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or listed buildings, it should be demonstrated that the development would not have any unacceptable effects.</p>	<p>As discussed, the site is within a Special Protected Area. As a result of the sheer scale of this designation, we consider that a mast of this size and scale will cause negligible direct impact on the designation.</p>

Policy DS4 ‘Amenity’

- 4.5.2. Policy DS4 ‘Amenity’ states *“that all proposed development must have full regard to opportunities for maintaining and improving environmental quality. Development will not be permitted where there is an unacceptable adverse impact on the surrounding area or the environment or amenity of existing or future occupiers of adjoining or nearby properties.”* The visual impacts of the proposal have been discussed above in the context of Policy TC13. Due to the nature and design of the development the proposal would not result in unacceptable impacts upon residential amenity in terms of noise, smell, light pollution, overlooking or overshadowing. The proposal would be served by existing hill tracks. Please refer to Location Plan 3 which gives a satellite context to the site. The adopted LDP has no further commentary or policies that are considered to be relevant to this proposal. Further, there are no Statutory Supplementary Guidance documents that are considered to be relevant to this application.
- 4.6. Overall, the planning policy position is considered to be supportive of proposals to erect radio masts sheds of this kind, subject to their siting and design.
- 4.7. Angus Council: Planning Advice Note No.26: Telecommunications Developments**
- 4.7.1. Angus Council have also published Advice Note 26 which informs interested parties of the considerations that Angus Council will apply to planning applications submitted in respect of telecommunications developments. It notes that *“The Scottish Executive has amended the planning regulations to require the majority of telecommunications developments to seek planning approval”* and notes that the Executive has emphasised the economic and social necessity to maintain the momentum in continuing to develop the telecommunications infrastructure.

4.7.2. The Note discusses visual impacts of telecommunication developments in the open countryside and states that: *“Site selection in the countryside has in the past been largely driven by purely technical demands but operators will now be expected to give greater consideration to visual impact alongside their practical requirements. It is possible to find perfectly acceptable rural locations by carefully exploiting topographical features, for instance by utilising the land form to hide or partly screen a mast. Skyline locations will only be acceptable when the operator can prove there are no better practical solutions, i.e. only as a last resort”*. As mentioned, the topography of the area helps to screen the mast from certain aspects.

4.7.3. The document also comments on design and notes that *“in open rural areas, pale grey; and on buildings the best colour finish is one that matches the background.”* As mentioned, the mast we are proposing is the colour grey.

4.7.4. There is no Supplementary Guidance specifically on telecommunication developments.

4.8. National Planning Policy Context

4.8.1. As noted above, NPF3 (2014) and SPP (2014) do not have the status of forming part of the Development Plan, but are relevant material considerations for all planning applications. National planning policy and advice currently comprises: the National Planning Framework for Scotland 3 (2014); Scottish Planning Policy (2014 (Revised December 2020)).

4.9. The National Planning Framework for Scotland 3 (NPF3)

4.9.1. NPF3 represents a spatial expression of the Scottish Government’s aspirations for sustainable economic growth in Scotland over the next 20-30 years. It sets out at the national level, the Scottish Government’s strategy for the country’s development, in terms of how we are to develop our environment, and includes development proposals identified as schemes of national importance. Whilst it is not prescriptive, NPF3 will form a material consideration when determining applications and, as such, will be a consideration in determining the application for any proposed development.

4.9.2. National Planning Framework 3 highlights the importance of digital infrastructure across towns and cities, and in particular the more remote rural areas. It hopes for investment in digital infrastructure will play a key role in improving competitiveness, ensuring that there is no digital divide between rural and urban Scotland.

4.9.3. In December 2020 the Scottish Government published its Position Statement in respect of the ongoing production of NPF4. It notes that: *“Our spatial strategy will continue to support the roll-out of digital infrastructure across Scotland.”* (page 26).

4.10. Scottish Planning Policy (SPP)

4.10.1. Scottish Planning Policy (SPP) (2014) is a statement of Scottish Government policy on land use planning. A revised version of SPP was published in December 2020 which contains altered text specifically in relation to the key policy principle of the presumption in favour of sustainable development. The remainder of the text is the same as the original SPP published in 2014.

- 4.10.2. SPP specifies that planning authorities should support development that helps deliver the Scottish Government's commitment to world-class digital connectivity. In its commentary on connectivity, SPP notes that *"By aligning development more closely with transport and digital infrastructure, planning can improve sustainability and connectivity. Improved connections facilitate accessibility within and between places – within Scotland and beyond – and support economic growth and an inclusive society"* (page 7)

5. Site Constraints

5.1. This Section provides an overview of those matters that can be assessed using web-based resources to check that any key sensitivities will not be affected by the proposals. We have already highlighted that the site is within a Special Protected Area above.

5.2. Cultural Heritage

5.2.1. Dealing with the historic environment and cultural heritage, Historic Environment Scotland's Pastmap web resource offers a map-based guide to where designated historic environment sites are situated. There are no designated cultural heritage sites on the proposals site.

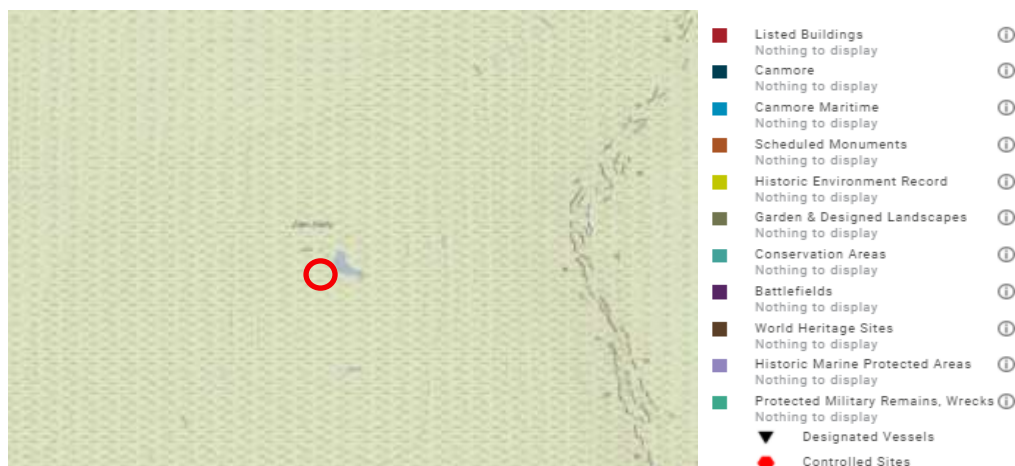


Figure 3 - Cultural Heritage Constraints

5.3. Hydrology and Flood Risk

5.3.1. SEPA's flood risk map offers an online map-based tool to assess where flood risk is present around the country. The screen-shot below shows the area of the proposals site, indicating that flood risk is not present on the site itself.



Figure 4 - SEPA Flood Risk Map

5.4. Prime Agricultural Land

- 5.4.1. The Scotland's Environment website also offers an online map showing land capability for agriculture that differentiates land considered to be prime agricultural land as classifications 3.1 and above. The screen-shot below shows that none of the preferred site is considered to be on land designated as being prime agricultural land. The land is instead categorised as grade 7 as land with very limited agricultural value.

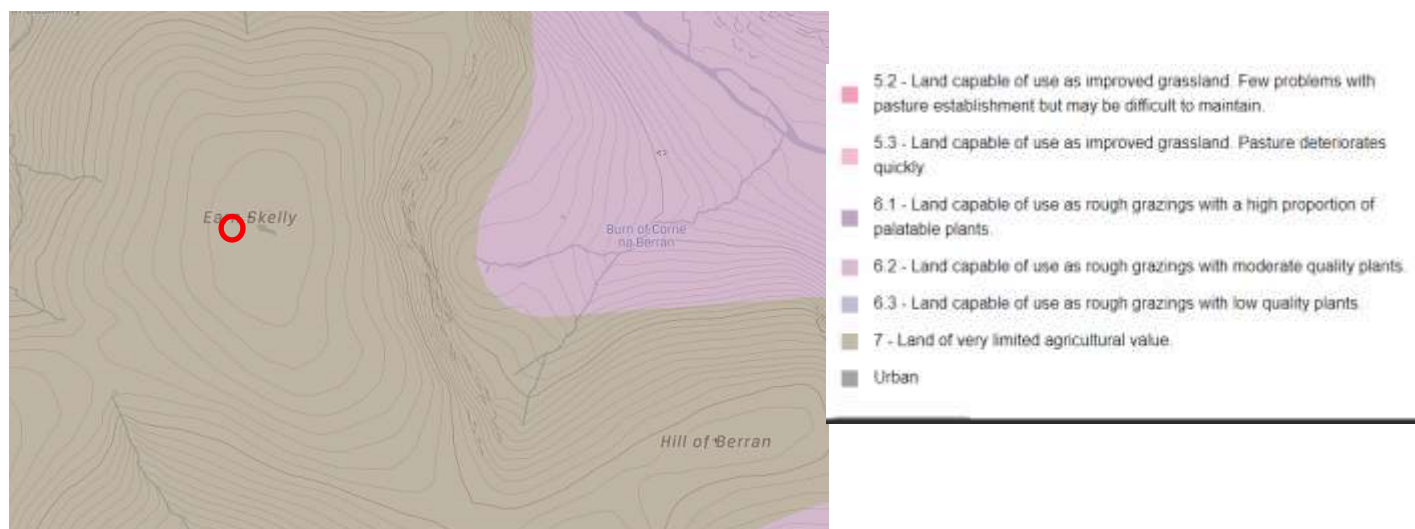


Figure 5 - National Scale Land Capability for Agriculture

6. Conclusion

- 6.1. The proposed development will greatly assist the functioning of Hunthill Estate. As mentioned, there is currently no mobile telephone coverage with an exception of very small areas, on the estate. The construction of a mast to provide communications radio coverage to current 'black spots' which are extensive across the landholding will help Estate staff members communicate better with each other.
- 6.2. Currently, each member of staff is provided with a communications radio within their work vehicle and a separate hand held radio for use outside the vehicle. This is the only means of communication to other staff members and onwards to emergency services, when on the hill. This is posing a huge Health & Safety risk which would be overcome by the siting of the radio mast at the proposal site.
- 6.3. The location for this mast was chosen on the advice of the radio communications provider to maximise coverage whilst also selecting a site which will not be in direct visual line of site from the Glen Road.
- 6.4. The proposed mast is designed so that it can blend in with the surrounding landscape. It should not affect residential or public amenity and will only be seen by a small number of people either walking the hills or working across the estate.
- 6.5. National and local planning policy provides support for telecommunications infrastructure and highlights the importance of ensuring that rural and remote rural areas have the same level of connectivity as urban areas.
- 6.6. Considering all of the above, it is hoped that Angus Council can support this application that will greatly assist this rural business in its day to day operations. Please do get in touch if you require any further information on the proposal.

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