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Date: 27th February 2024

Dear Sir or Madam

**SHARED RURAL NETWORK – THREE UK – TOTAL NOT SPOT (TNS) PROGRAMME
FULL PLANNING APPLICATION
PROPOSED COMMUNICATIONS DEVELOPMENT TNS0214 AT LAND NE OF CORRIEMULZIE
LODGE, OYKEL BRIDGE, LAIRG, HIGHLAND, IV27 4BH, NGR: 232841, 896506**

I am writing further to pre application discussions which introduced Three UK as one of the UK's four mobile network operators (along with EE, Vodafone and O2) working on the Total Not Spot Programme (TNS) part of the wider Shared Rural Network Scheme (SRN). Mitie are appointed as the Acquisition & Planning agents working on behalf of Three UK on the Total Not Spot (TNS) programme in your local authority area.

As you will be aware, the Shared Rural Network (SRN) is a telecommunications programme which sees the UK Government working in partnership with the four UK mobile network operators - EE, O2, Three and Vodafone - to increase mobile connectivity in rural parts of the UK.

Mobile connectivity has become an integral part of society with extensive economic and social benefits however, it is recognised that the lack of mobile communications coverage in remote and rural areas intensifies the digital divide and can hinder rural development. The Shared Rural Network will deliver 4G coverage to 95% of the UK, offering significant improvements to mobile coverage for rural communities, businesses and visitors. These improvements cannot be delivered without the building of new infrastructure. The TNS Programme involves the construction of new infrastructure in areas where there is currently no 4G coverage from any mobile operator. Every new site on the TNS Programme will be available to all the mobile operators to share including the new emergency services network (ESN), thereby providing essential connectivity across all operators.

The proposed development related to this application is hosted by Three UK. The proposal has been identified following rigorous site investigations and allows for the programme to meet coverage obligations as set by Ofcom, the programme regulator.

The proposed development comprises:

- Proposed installation of a 25m high lattice tower accommodating 3no. antennas, 4no. 0.6m transmission dishes and ancillary development in a compound surrounded by a fence enclosure and gabion walls. The proposed compound will accommodate 7No outdoor equipment cabinets, 1No electrical meter cabinet; 1No Standby power generator and ancillary development. The proposed new compound will be accessed via a proposed 1074m ATV only track going through the firebreak in the forestry from the existing estate track located to the southeast.

Please find enclosed the following documents which make up the planning application:

- Full Planning Forms
- Site Location Plan ref: TNS0214H_HLD713_GA_REV_B - 002A SITE LOCATION PLAN SHEET 1 OF 4
- Area Layout ref: TNS0214H_HLD713_GA_REV_B – 002E BUILD AREA LAYOUT
- Proposed Site Plan Ref: TNS0214H_HLD713_GA_REV_B – 210 PROPOSED SITE PLAN
- Site Elevation Drawing A ref: TNS0214H_HLD713_GA_REV_B – 260 PROPOSED SITE ELEVATION NORTH
- Site Elevation Drawing B ref: TNS0214H_HLD713_GA_REV_B – 261 PROPOSED SITE ELEVATION EAST
- Site Elevation Drawing C ref: TNS0214H_HLD713_GA_REV_B – 262 PROPOSED SITE ELEVATION SOUTH
- Planning and Design Supporting Information
- [REDACTED]
- Landscape and Visual Impact Assessment, including Photomontages (to follow)
- Zone of Theoretical Visibility (ZTV) (to follow)
- Peatland Assessment (to follow)
- Ecological Survey (to follow)
- Coverage Plots
- ICNIRP certificate

The proposed development detailed in the enclosed application is considered to be the most suitable site location and design that balances technical and operational requirements with national and local planning policies and guidance.

If appropriate, we would be keen to arrange a presentation or meeting with your officers and members to discuss this proposal and we would be happy to provide any additional information that is required to assist in the determination of this application. We look forward to receiving your acknowledgement that this application has been registered.

Kind Regards,

[REDACTED]

Hannah Morrison MRTPI | Acquisition and Planning Surveyor | Technical Services

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[REDACTED]
Email: Hannah.Morrison@mitie.com

(For and on behalf of Three UK)



PLANNING AND DESIGN SUPPORTING INFORMATION

1. Site Details

Site Name:	CORRIEMULZIE LODGE NE	National Grid Reference:	232841, 896506
Site Address:	NE OF CORRIEMULZIE LODGE, OYKEL BRIDGE, LAIRG, HIGHLAND, IV27 4BH		
Site Ref Number:	TNS0214	Site Type:	Greenfield

2. Pre-application Checklist

Was a local planning authority mast register available to check for suitable sites by the operator or the local planning authority?	Yes	No
If no explain why:	It is considered that the industry specific Mast Data website (https://mastdata.com/) is the most up to date source of information on existing and proposed communications sites across the UK.	
Were industry site databases checked for suitable sites by the operator:	Yes	No
If no explain why:	n/a	

Site Specific pre-application consultation with Local Planning Authority:

Was there pre-application contact:	Yes
Date of pre-application contact:	12/02/2024
Name of contact:	Liam Burnside
Summary of outcome/Main issues raised:	<p>Pre application consultation reference: 24/00156/PREAPP was registered with Highland Council on the 23rd of January. We received a response from Liam Burnside dated the 12th of February which provided the following feedback:</p> <p style="padding-left: 40px;">Officer support could be forthcoming for the proposed development as long as the technical details included within this response are appropriately addressed;</p> <p style="padding-left: 40px;">Visualisations required of the full development, including Zone of Theoretical Visibility;</p> <p style="padding-left: 40px;">Justification required for siting and appearance of the proposed infrastructure, including justification of the total land take, as well as a statement on why no existing telecommunications masts can be utilised;</p> <p style="padding-left: 40px;">Peat Management Plan to show impacts on Class 5 Peatland are avoided and minimised through best practice techniques;</p> <p style="padding-left: 40px;">Habitat and biodiversity compensation and enhancement through a Habitat Management Plan that must also demonstrate biodiversity net gain;</p>

	<p>The application shall clearly evidence any stated social and economic benefits; Coverage map requested showing proposed coverage that will result from the proposed telecommunications infrastructure.</p> <p>In response to the pre application feedback received, an LVIA, including Photomontages/visualisations and ZTV will be provided in order to assist with the assessment and determination of this application. A site selection process and discounted options section are included within this Statement. As detailed further below, although the proposed site and access route is found to be on Class 5 Peatland which is categorised by NatureScot as an area where <i>'no Peatland habitat is recorded'</i>, we have taken on board the pre application feedback by the Council and will therefore provide a Peatland assessment during the course of the application to assess the proposed development impact in more detail. We will also be providing an Ecological Assessment during this planning application. A public benefit and coverage uplift section are included within this statement.</p>
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Community Consultation

<p>Rating of Site under Traffic Light Model: AMBER</p>
<p>Outline of consultation carried out: Pre application community consultation emails which provided details of the SRN Project and the proposed development subject of this application were issued to the following interested parties on the 18th of January 2024 with a request for feedback, comments and queries prior to the submission of a formal planning application:</p> <p style="text-align: center;">Councilors for Ward 1: North, West and Central Sutherland – Michael Baird, Marianne Hutchison and Hugh Morrison Ardgay and District Community Council</p>
<p>Summary of outcome/main issues raised:</p> <p>To date we haven't received any responses to the above Community Consultation exercise, however we are keen to keep communication channels open with any interested parties in order to provide additional information and respond to concerns and queries that might be raised during the course of the application.</p>

School/College

<p>Location of site in relation to school/college (include name of school/college): There are no schools or colleges in the vicinity of the proposed site.</p>
<p>Outline of consultation carried out with school/college (include evidence of consultation): n/a</p>

Summary of outcome/main issues raised (include copies of main correspondence):
n/a

Civil Aviation Authority/Secretary of State for Defense/Aerodrome Operator consultation

Will the structure be within 3km of an aerodrome or airfield?	Yes	No
Has the Civil Aviation Authority/Secretary of State for Defense/Aerodrome Operator been notified?	Yes	No
Details of response:		

3. Proposed Development

The proposed site:

The proposed site is located at Land Northeast of Corriemulzie Lodge, by Oykel Bridge, Lairg, Highlands, IV27 4BH. NGR: 232841, 896506



Site Photograph



Located in the Caithness and Sutherland County area, the proposed development site is located in a remote, predominantly upland area of the Scottish Highlands, approximately 7km Southwest of Oykel Bridge and 20km East of Ullapool. The wider area surrounding the proposed development is characterised by vast rolling hills forming broad, subtly rounded summits often featuring steep slopes, narrow glens and fragments of broadleaf woodland. The development site is located approximately 870m West of an existing, good quality private track that leads from Oykel Bridge in the North, enabling vehicular access from the public road to various sections of the wider Estate.

Ground conditions at the application site are a mixture of rough grassland, heather and concentrated parcels of woodland, with various streams and watercourses found at lower altitudes. While the application site lies just outwith the Wild Land boundary identified by NatureScot, the wider landscape is characterised as being part of the Rhiddoroch - Beinn Dearg - Ben Wyvis Wild Land Area, which is described by NatureScot as comprising a variety of mountains, both massive and rounded landforms, as well as rockier peaks and ridges, mostly covered by a short mat of vegetation and/or exposed rock. The character of the development site is also in line with the key characteristics outlined in NatureScot's Landscape Character Type 135 - *Rounded Hills – Caithness and Sutherland*, comprising rolling hills forming broad, subtly rounded summits, along with hills cut by numerous narrow burns and small lochans lying within dips, corries and on plateau summits. The convex character of the hill slopes also limit distant visibility and views of the hill tops when travelling through the landscape. Open heather ground cover and moorland grasses also dominate much of the landscape, with the uniform colour and texture accentuating the landform.

Whilst the application site is not covered by any statutory designations, there are various protected landscapes and natural features close by. Namely, the River Oykel Special Area of Conservation is found approximately 950m Southeast of the proposed development. Beinn Dearg Site of Special Scientific Interest and Special Area of Conservation can also be found approximately 6km South of the proposed development, however given the distance of separation, it was considered there was no relationship between the mentioned sensitive land designations and the proposed site location, which is discussed further below.

As described, the development is being proposed to provide new communications connectivity in this area which has been classed by the Government and OFCOM as a Total Not Spot (TNS). The siting of the apparatus is driven by that coverage requirement with a proposed site location and structure height designed to provide as much coverage as possible for the lowest visual and environmental impact.

Type of Structure (e.g. tower, mast, etc.):

Description:

Proposed installation of a 25m high lattice tower accommodating 3no. antennas, 4no. 0.6m transmission dishes and ancillary development in a compound surrounded by a fence enclosure and gabion walls. The proposed compound will accommodate 7No outdoor equipment cabinets, 1No electrical meter cabinet; 1No Standby power generator and ancillary development. The proposed new compound will be accessed via a proposed 1074m ATV only track going through the firebreak in the forestry from the existing estate track located to the southeast.

Overall Mast Height:

25m

Equipment Housing:

- 1No Meter Cabinet – 1500x490x1200mm – Fir Green RAL6009
- 1No Ericson RBS6130 Cabinet – 650x700x1100mm - Fir Green RAL6009
- 1No Alifabs Viper Cabinet – 600x600x1750mm - Fir Green RAL6009
- 1No ICD EE Airo DC Cabinet – 750x700x2100mm – Fir Green RAL6009
- 1No Vertiv EE M35 PSU Cabinet – 730x750x1800mm - Fir Green RAL6009
- 1No Alifabs EE Viper Cabinet – 600x600x1750mm – Fir Green RAL6009
- 1No VF Power/BBU Cabinet – 823x640x1721mm – Fir Green RAL6009
- VF RRU Rack – 750x700x2100mm – Fir Green RAL6009

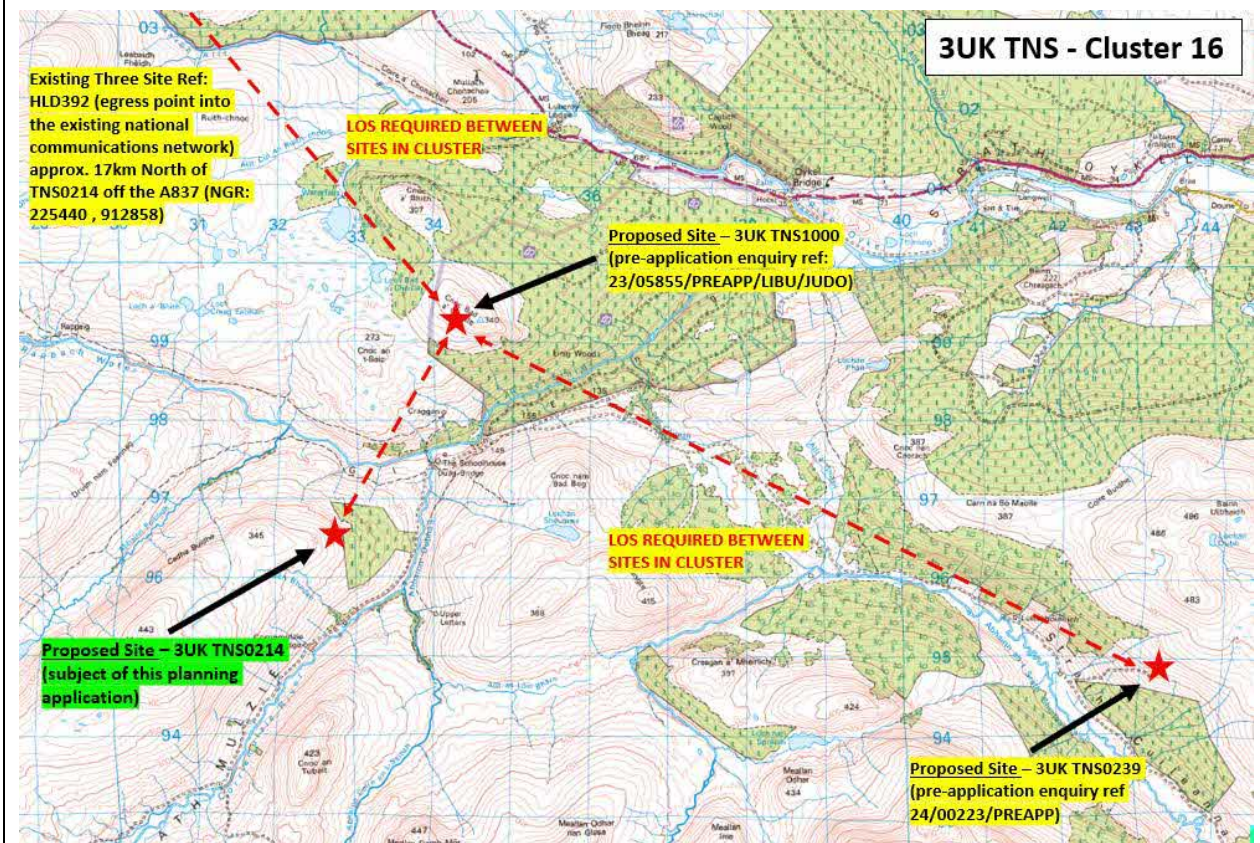
Materials (as applicable):	
Tower/mast etc. – type of material and external colour:	The proposed lattice mast would be constructed from galvanised steel and colour coated Fir Green (RAL6009) in order to minimise visual contrast with the surrounding area.
Equipment housing – type of material and external colour:	The proposed equipment housing would be coloured Fir Green (RAL6009) to minimise visual contrast with the surrounding environment.

Reasons for choice of design:

Each TNS site has been designed to provide 4G coverage for all Mobile Network Operators.

Three UK have confirmed that the proposed mast height of 25m at this location is the minimum height possible to provide the necessary level of TNS pixel coverage uplift in this area of Caithness and Sutherland while also gaining a clear LOS from the adjacent site in the Cluster to the North, in this case, TNS1000, which will be subject of a separate planning application in due course.

Due to the very remote nature of the TNS site requirements, they will rely on having clear Line of Sight (LOS) to link back to the national mobile communications network using transmission dishes on the mast. On that basis, the full list of site requirements was split up into different groups of sites (Clusters) which would link into each other using LOS transmission dishes before then connecting into the existing national network via LOS transmission links to an existing and established communications site. Where operationally and physically feasible, proposed new site locations have been microsited to avoid the most exposed locations and most sensitive designations, while also aiming to use existing and established access tracks for construction and maintenance purposes.



As with many infrastructure projects form follows function, however in this case, the lattice form which is designed to accommodate the necessary communications equipment while also being structurally suitable for this rural location also has the benefit of being light permeable, thereby ensuring that its form is diffused

when viewed from surrounding viewpoints. This open lattice construction helps to minimise visual impact more than a solid, unbroken form such as a wind turbine.

The proposed mast and ancillary development at this site location will benefit from the visual screening and backdropping provided by the rising hillside to the West in addition to the screening and vertical context provided by adjacent plantation of mature trees. In order to reduce contrast between the proposed development and the surrounding forestry, we would propose to colour all of the proposed equipment, including the mast, in a Fir Green colour (RAL6009).

ICNIRP compliance

A site specific Certificate of ICNIRP Compliance forms part of this planning application.

4. Technical Justification

Enclose predictive coverage plots if appropriate, e.g. to show coverage improvement.

Reasons why site required e.g. coverage, upgrade, capacity:

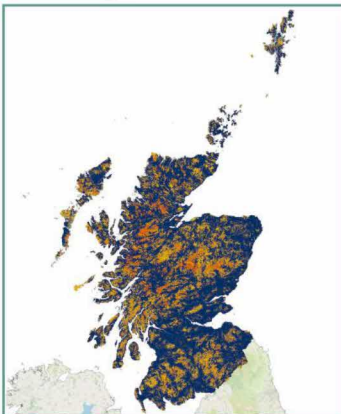
Mobile network coverage in rural areas of Scotland is often very poor or non-existent and this is a familiar issue to those who live, work and visit rural areas. As discussed in the covering letter and enclosed supporting information, the Shared Rural Network (SRN) is a UK Government initiative to address the digital divide and improve mobile connectivity into rural areas. The plan below is a visual representation of the levels of 4G coverage across Scotland before the SRN Project began, along with a forecast level of coverage following the completion of the SRN Project:

SHARED RURAL NETWORK Coverage Forecast Improvements in Scotland

PRE-SRN



POST-SRN



Key:

- Total not-spots, areas with no 4G coverage from any operator
- Partial not-spots, areas with 4G coverage from at least one, but not all four operators
- 4G coverage from all four operators

Notes:

Forecast improvements subject to availability of EAS sites.

Coverage improvements subject to finding suitable sites, obtaining power supply and backhaul and securing the necessary permissions through the planning system.

For more information, please contact us here:
sm.org.uk
info@sm.org.uk



UK Government



The Shared Rural Network was developed to improve digital infrastructure across the UK, ensuring that people and businesses have access to a reliable 4G mobile connection, regardless of their location. Good coverage and high-speed mobile connectivity are essential to a modern way of life, whether it's running a business, communicating with friends and family, working remotely, or accessing news and information instantly, there is a need for reliable, good quality coverage.

1. For those areas where there is some 4G coverage, but not from all four operators, known as partial not-spots, the MNOs are investing in extending coverage, by upgrading their existing networks. By closing the majority of partial not-spots across the UK, the programme will increase choice for rural communities and businesses and improve the experience for people travelling around the UK.
2. The publicly funded element will see new masts being built to target the hard-to-reach areas with no mobile coverage at all, known as total not-spots (TNS). The UK Government will pay for the infrastructure and masts to be built and all four MNOs will use the masts to provide coverage to their customers.

The proposed development subject of this application is part of the publicly funded Total Not Spot (TNS) part of the project.

The Shared Rural Network programme is regulated by Ofcom, with regular reporting throughout the life of the programme to ensure agreed obligations and targets are met.

The benefits of reliable 4G mobile connectivity are far reaching and have positive impacts on many aspects of day-to-day life. There are many personal and commercial benefits, as well as positive impacts on healthcare, education, tourism, remote working, and accessing online services, to name a few. In some of the more remote locations, one of the main benefits of the development will be in terms of improved health and safety to those who work or visit the area.

Bearing in mind the very specific geographical coverage requirements for the TNS area, several alternative siting and design options were considered to provide this coverage, but duly discounted as unavailable or less desirable in terms of integration into the environment when compared to the proposal subject of this application. Details of the alternative options considered are discussed later in this statement.

Public Benefit

Underpinning current enthusiasm for mobile connectivity is both the inexorable increase in consumer demand (both business and personal) and the recognition that such connectivity can be used for a large number of economic, social and environmental changes which could improve all our lives. Set out below are some key documents which help to demonstrate both the public benefit and the shift in public policy to accommodate the demand for mobile connectivity and the public benefits which will flow from it. Whilst planning is devolved, regulation of the telecommunications sector is reserved and, as such, some initiatives such as the Shared Rural Network, are UK wide.

The annual OFCOM Connected Nation report is a good starting point for analysing trends in the telecommunications sector and this highlights both the sheer size and importance of the sector to the UK and Scotland but also the huge increases in data demand from mobile networks. The most recent interim report: “Connected Nations Summer Update 2023”¹ detailed the following findings:

- 4G: Coverage of 4G mobile networks across the UK has not seen significant changes since the last Connected Nations Update. Around 93% of the UK landmass is predicted to have good outdoor 4G coverage from at least one operator, and this is expected to rise to 95% by end of 2025 as a result of the SRN.
- Landmass coverage by 4G mobile networks in Scotland is currently significantly lower than the UK as a whole. Under the Government’s SRN investment, the individual MNOs are committed to achieving between 82% and 85% landmass coverage from at least one operator by 2027.
- 4G not-spots: The UK has both geographic and road not-spots (areas where 4G services are not available from any mobile operator). While the UK wide geographic not-spots have recently decreased from 8% to 7%, the level of not-spots in Scotland are significantly higher at 16%.

In 2018, recognising the increasing importance of Digital Communications to everyday life, the UK

¹ https://www.ofcom.org.uk/data/assets/pdf_file/0033/267594/SummerUpdate2023Final.pdf

Government published the Future Telecoms Infrastructure Review in July 2018². The Ministerial Foreword to this report includes the following statements which reinforce the importance of high quality digital communications:

“There is a real opportunity for the UK to become a world leader in digital connectivity – increasing our competitiveness, boosting productivity and meeting future demands of consumers and businesses.”

“We want to provide world-class digital connectivity that is gigabit-capable, reliable, long-lasting and widely available across the UK – and to do so at pace.”

“We want to ensure that the UK has the strongest conditions in place to secure the investment we need. To do this, as we move from a part fibre, part copper roll out to a full fibre and 5G roll out, we will make sure that competition and innovation can thrive. This means regulation that is limited to where it is necessary, and provides the longer-term stability and predictability that investors need. The UK must become the easiest and the most attractive place to invest in new digital infrastructure.”

“We are determined to ensure the UK has the telecoms infrastructure to meet the growing demands of consumers and businesses and promote the benefits of connectivity across the UK.”

“Digital infrastructure is central to the future of the UK economy. This national strategy will create the right market and policy conditions to secure world-class connectivity for all..”

It is this backdrop within which the SRN project sits. An overview of the SRN Project was provided earlier in this statement and further information from the SRN project organisation on the benefits across society are enclosed with this application under the following headings:

- Programme Summary
- Local Authorities
- People & Communities
- Health & Wellbeing
- Sustainability & the Environment
- Rural Business
- Tourism

The Shared Rural Network Project also fits into the ongoing Scottish Government's Mobile Action Plan, published in 2016³ which makes the following introductory statement:

“Ensuring high quality digital connectivity across all of Scotland is a priority for the Scottish Government (SG). We have set out an ambition for the availability of world class digital connectivity across Scotland, and we recognise that improved mobile connectivity is an integral part of delivering that ambition. SG has been working with the Scottish Futures Trust (SFT) to determine how we can most effectively support industry to deliver a 5G-ready infrastructure across all of Scotland.

The UK mobile network operators (MNOs) have demonstrated a clear commitment to maximise coverage, not least by investing substantial sums in rolling out 4G networks across the country. Significant progress is being made towards meeting 4G coverage obligations and the 90% geographic coverage agreement. Nevertheless, we collectively recognise that once commercial deployment is complete, coverage gaps will still remain in some of the most rural and remote areas.”

This translates directly to the Action Plan's stated objective which is:

² https://assets.publishing.service.gov.uk/media/5b6aa54d40f0b62ea600fd39/Future_Telecoms_Infrastructure_Review.pdf

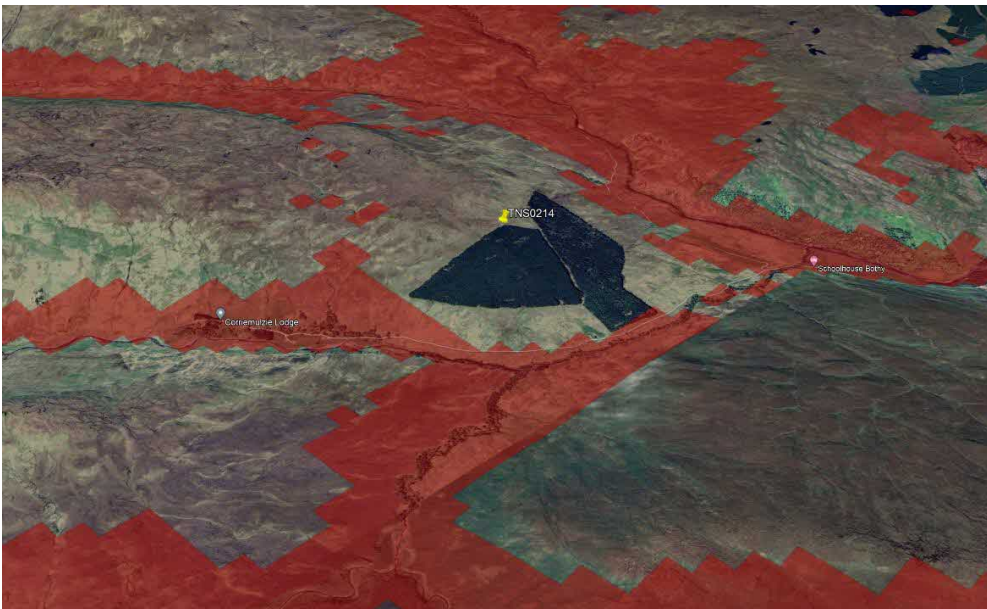
³ <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2016/06/mobile-action-plan/documents/mobile-action-plan-pdf/mobile-action-plan-pdf/govscot%3Adocument/Mobile%2BAction%2BPlan.pdf>

“SG and the mobile operators are committed to working together on a range of measures aimed at improving mobile coverage across Scotland. We will identify where the gaps will be after commercial rollout and jointly design technology solutions and business models that will allow services to be delivered by operators in a sustainable way. This action plan sets out tangible steps that will be taken by SG, alongside public sector partners, to support that ambition. These will aim to take costs out of operators’ business models in non-commercial areas and will range from interventions such as business rates relief through to more direct interventions, such as investing in the construction of new or enhanced infrastructure.”

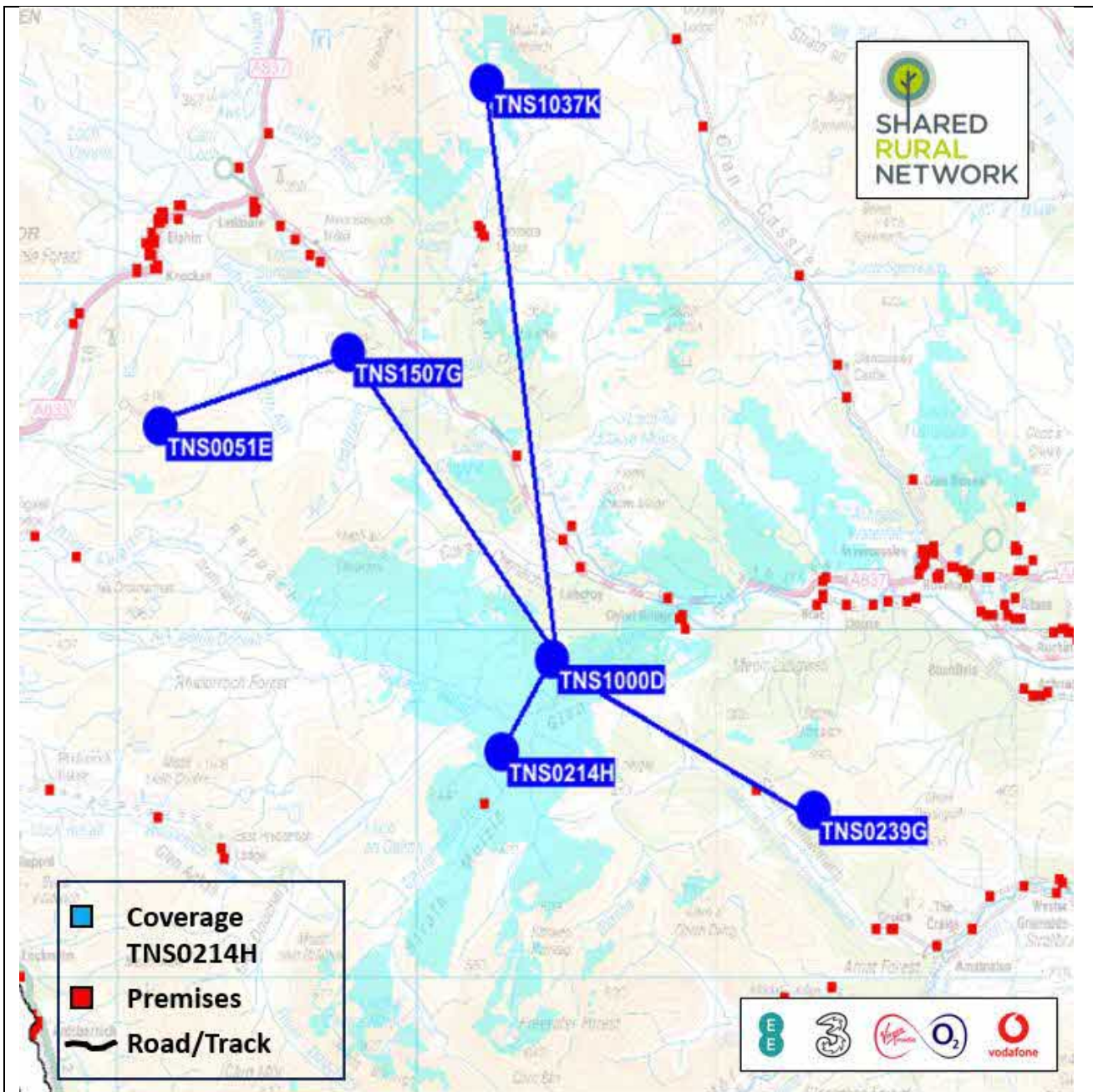
It is considered that the Shared Rural Network Project fits squarely into these overall objectives and aspirations. The SRN Project will deliver reliable 4G mobile connectivity allowing rural businesses and rural communities to prosper and thrive. The project will play a crucial role in addressing the urban rural digital divide.

As demonstrated above and detailed in the enclosed documents, the public benefit of the proposed development cannot be under dispute. On that basis, the weight that Public Benefit should be afforded when assessing the siting and appearance of the proposal is significant.

Coverage Uplift Area and Site Specific TNS Coverage Uplift



The target area of coverage uplift for TNS0214 is illustrated by the red highlighted areas shown on the aerial image above. The red shading on the above image illustrates Total Not Spot (TNS) coverage areas which the UK Government and mobile operators aim to remedy as part of the TNS Project. The following coverage plot illustrates the new 4G coverage that will be provided solely from the development subject of this application, TNS0214. As illustrated by the blue shaded areas on the plan below there will be a significant uplift in 4G coverage for all mobile Operators to surrounding Total Not Spot (TNS) areas including vast areas of surrounding Corriemulzie land (including the main Corriemulzie Lodge), a number of properties near the A837, sections of the A837 to the Northeast; as well as a number of popular walking routes to nearby hilltops. Ultimately, it is expected that Estate workers (often lone working), walkers and hikers, as well as mountain rescue teams would see benefit in the introduction of 4G coverage in the area from all mobile Operators. While there may be few existing businesses or residential properties in the area benefiting from a coverage uplift, one of the principal benefits from the development will come in the form of improved health and safety to those people working and undertaking recreational activities here. The following coverage plot includes the proposed locations of the other sites in this TNS Cluster; however, these will be subject of separate planning applications and will provide their own individual coverage uplift to surrounding TNS areas.



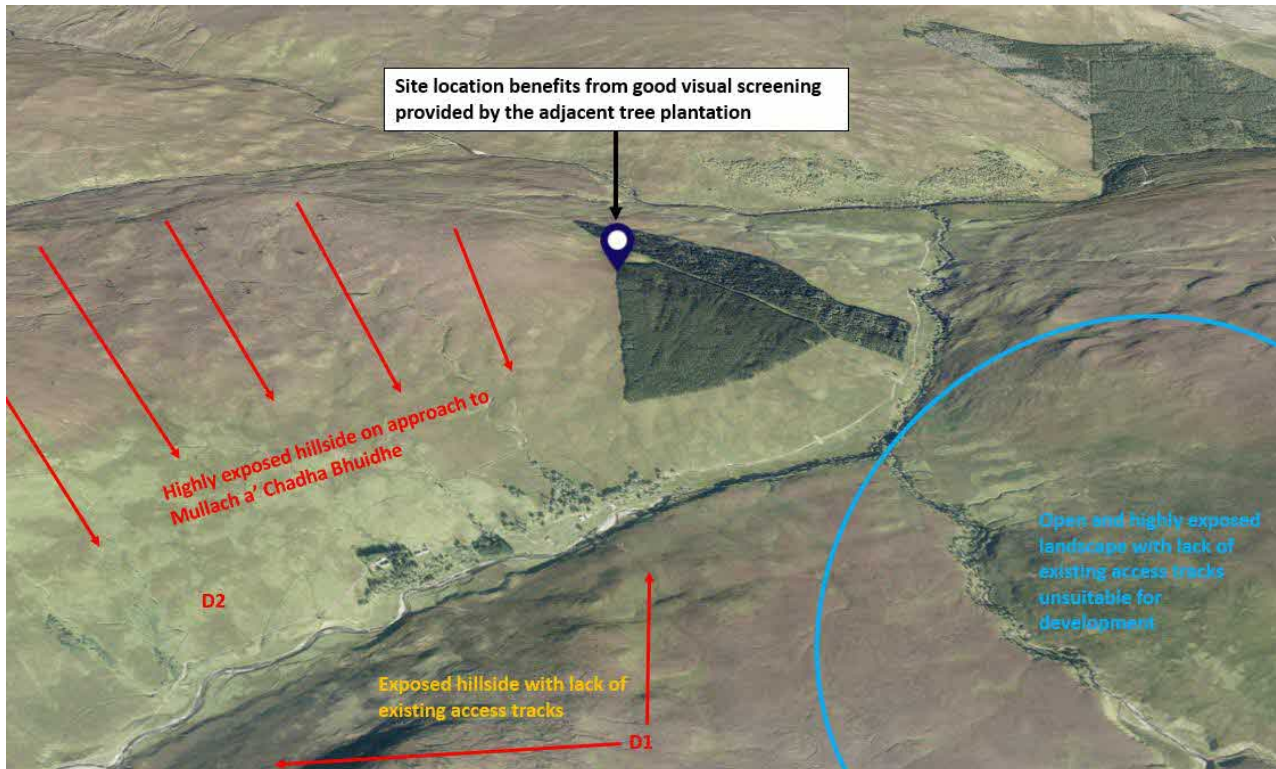
5. Site Selection Process

Alternative sites considered and not chosen:

Site Ref:	Site Location	NGR	Reason for Discounting
D1	South of Corriemulzie river	233015 , 895114 232138 , 894233	A number of options to the South of the Corriemulzie river were assessed and later discounted following a review with Radio and Transmission specialists who confirmed a mast of a substantially greater height would be required in order to gain the mandatory level of TNS coverage pixels and ensure connectivity into the wider national network. It was considered that progressing with a 25m high mast at the proposed location subject of this letter (with the adjacent tree plantation providing a degree of vertical screening when seen from surrounding viewpoints) would have less impact on the character and amenity of the area when compared with a mast of approx. 40m located on relatively open and exposed ground to the South of the river.

D2	Northwest of existing track through Strath Mulzie	Various	The land to the Northwest of the existing track going through Strath Mulzie was assessed and subsequently discounted due to the lack of available screening opportunities and existing vehicle tracks. Coupled with the vast and exposed nature of the landscape in this area, it was considered the site subject of this letter benefits from good visual screening provided by the adjacent tree plantation, with the majority of the proposed track going through a firebreak in the plantation, minimising tree removal as well as the visual harm of a new track when viewed from surrounding viewpoints.
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Map of Discounted Site locations:



Planning Policy and Guidance :

National Planning Framework 4

National Planning Framework 4 (NPF4) is the national spatial strategy for Scotland which replaces NPF3 and Scottish Planning Policy (SPP). It sets out Scotland's spatial principles, regional priorities, national developments and national planning policy and stresses the importance of providing high quality communications networks across the country. The following policies from NPF4 are considered relevant to the proposal subject of this application:

Policy 1 relates to climate change and states: *"When considering all development proposals significant weight will be given to the global climate and nature crises."*

It is commonly understood that the provision of digital technologies had the ability to significantly reduce global carbon emissions. According to MobileUK's publication: 'Connectivity and Climate Change,' high quality communications and connectivity can have a positive impact on accelerating the move to wind and solar energy; reduce emissions from transport; and transform the agricultural industry and rural economy through the use of drones and sensors connected to mobile networks. In the most remote locations, high quality digital connectivity has the potential to assist with many aspects of rural land management including deer surveys; protected species monitoring; peatland and woodland restoration monitoring; and re-wilding monitoring and reporting.

Policy 3 relates to the protection and enhancement of biodiversity and section c) specifically relates to Local Developments and states: *“Proposals for local development will include appropriate to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of development.”*

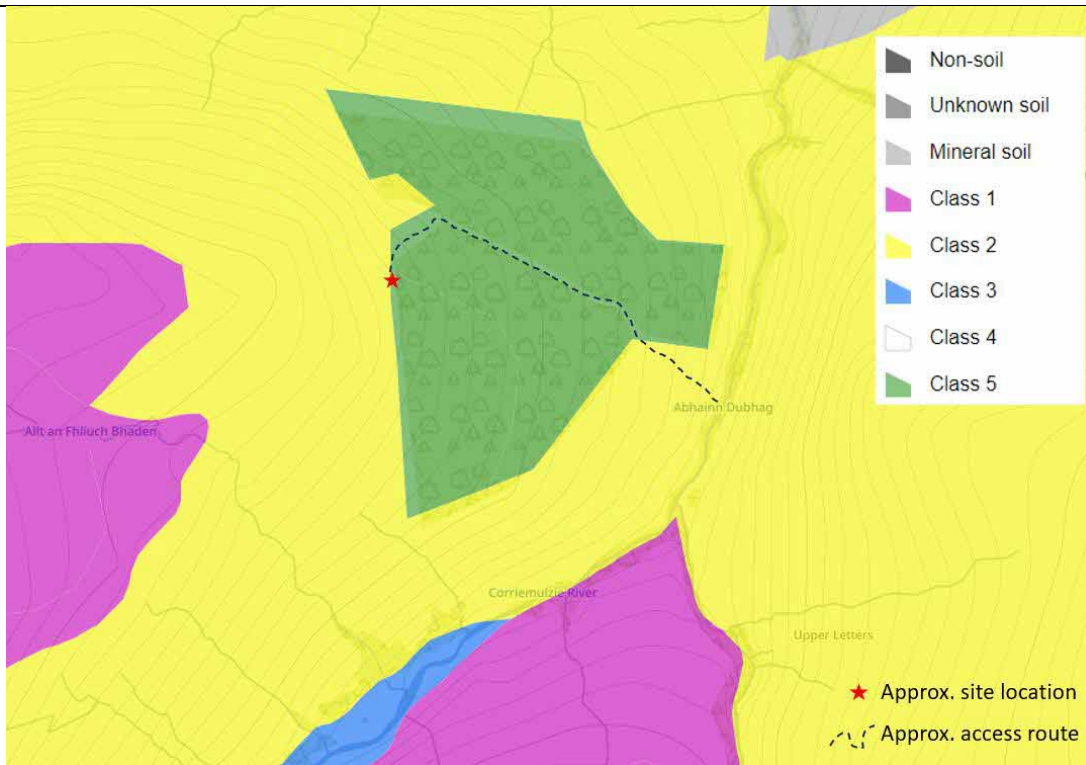
In line with Policy 3 of NPF4, appropriate measures have been taken to avoid and protect biodiversity in this area. A number of options were explored as part of the site search activity, with the final proposed option being the best when viewed in the perspective of both achieving the required coverage and protecting biodiversity. Furthermore, the development site has been located as close to the existing Estate tracks as possible to ensure the least amount of disruption to the surrounding land and adjoining tree plantation during the site construction and ongoing maintenance of the site.

Policy 4 aims to protect, restore and enhance natural assets across Scotland. It confirms that where development proposals have a potential to affect locally, regionally, nationally or internationally important natural assets, they will only be supported where the overall integrity of the areas will not be compromised or where any adverse effects *‘are clearly outweighed by social, environmental or economic benefits.’* Section g) of Policy 4 relates to development on land identified as a NatureScot and confirms that development will only be supported where it; *“i. will support meeti renewable energy targets; or, ii. is for small scale development directly linked to a rural business or craft, or is required to support a fragile community in a rural area.”*

In line with Policy 4, the proposed development is not located within any statutory designations, however, it is noted the proposal is adjacent to the Rhiddoroch - Beinn Dearg - Ben Wyvis Wild Land Area boundary. Notwithstanding, due care has been taken when siting the proposed development to minimise impact on the surrounding area, for example by proposing access through a firebreak to minimise tree removal and siting the compound adjacent a woodland plantation where the equipment will benefit from natural visual screening from the trees to the East. Overall, it is considered that any minor harm caused is clearly outweighed by social, environmental or economic benefits that high quality digital communications will provide to those working, living and visiting this area. It is considered that the proposed development is compliant with Policy 4 of NPF4 as it will directly benefit rural businesses working in the surrounding areas (especially in terms of health and safety relating to remote working, etc) and it will help to support the local community in terms of providing access to the social, environmental and economic benefits associated with high quality mobile communications services.

Policy 5 aims to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. Section d) of Policy 5 provides details of the assessment requirements for development on peatland as follows: *“Where development on peatland, carbon-rich soils or priority peatland habitat is proposed, a detailed site specific assessment will be required to identify: i. the baseline depth, habitat condition, quality and stability of carbon rich soils; ii. the likely effects of the development on peatland, including on soil disturbance; and iii. the likely net effects of the development on climate emissions and loss of carbon.”*

While the proposed site subject of this development is located in the Class 5 Category on NatureScot’s Carbon and Peatland Map 2016 (which is described as areas where no peatland habitat or vegetation is recorded) our proposed access from the existing access track does go through an area of Class 2 Peatland, therefore, a Peatland Assessment will be provided to the Council to assist in the determination of this application. An annotated extract of the Carbon and Peatland Map 2016 at the proposed site location is provided below:



Policy 13 refers to sustainable travel and confirms that developments which ‘*reduce the need to travel unsustainably*’ will be encouraged and promoted.

In accordance with Policy 13 of NPF4, it is well known that the availability of high quality digital communications can reduce the need to travel by allowing more people to have the opportunity to work from home, thereby cutting down carbon-emissions produced by commuting.

Policy 14 aims to encourage, promote and facilitate development that makes ‘*successful places*.’ NPF4 highlights the six qualities of successful places including being ‘*Connected*’ by supporting well connected networks that make moving around easy and reduce car dependency and ‘*Sustainable*’ by supporting resources that will allow people to live, play, work and stay in their area.

The proposed off-grid communications development subject of this application will make a significant contribution towards meeting the six qualities which are considered to make successful places. The development has the potential to contribute to making the area more ‘*Healthy*’ by providing a reliable communications system for the many people working (often lone working), living and visiting remote parts of the country. The ability to make contact with other people or the emergency services in the event of an incident in these very remote areas can, at times, save lives. The provision of digital communications connectivity also contributes to the qualities of being ‘*Connected*’ by providing a well connected communications network and reducing car dependency and ‘*Sustainable*’ by providing resources that allow people to, ‘*live, play, work and stay in their area.*’

Policy 18 encourages an infrastructure first approach which puts infrastructure considerations at the heart of placemaking and confirms that: ‘*Development proposals which provide (or contribute to) infrastructure in line with that identified as necessary in LDPs and their delivery programmes will be supported.*’

Digital communications infrastructure, such as that proposed in this application, is confirmed as being ‘Essential infrastructure’ in the Glossary section of NPF4. The development subject of this application provides new essential infrastructure to a remote area of Scotland and, in line with NPF4, should be supported. The proposed new infrastructure will have immediate positive effects for those people living, working and visiting the area but will also provide a platform for continuous future improvements as the role of digital connectivity constantly evolves.

Policy 23 of NPF4 aims to protect people and places from harm and promote and facilitate development that improves health and wellbeing and confirms that: *'Development proposals that will have positive effects on health will be supported.'* It confirms that LDPs should 'seek to tackle health inequalities particularly in places which are experiencing the most disadvantage.'

As mentioned previously, the role of digital connectivity in health improvements is well known. The high quality mobile coverage provided from this proposed development will have many positive effects on health, however in a remote area such as this, the new ability for people to make contact with others or be contacted while in these locations can have life saving capabilities.

Policy 24 of NPF4 relates to Digital Infrastructure and is considered to be the most applicable policy to this proposed development as it aims to encourage, promote and facilitate the roll-out of digital infrastructure across Scotland to unlock the potential of all out places and the economy. The Policy states:

"a) Development proposals that incorporate appropriate, universal, and future-proofed digital infrastructure will be supported.

b) Development proposals that deliver new digital services or provide technological improvements, particularly in areas with no or low connectivity capacity, will be supported.

c) Development proposals that are aligned with and support the delivery of local or national programmes for the roll out of digital infrastructure will be supported.

d) Development proposals that deliver new connectivity will be supported where there are benefits of this connectivity for communities and the local economy.

e) Development proposals for digital infrastructure will only be supported where:

i. the visual and amenity impacts of the proposed development have been minimised through careful siting, design, height, materials and, landscaping, taking into account cumulative impacts and relevant technical constraints;

ii. it has been demonstrated that, before erecting a new ground based mast, the possibility of erecting antennas on an existing building, mast or other structure, replacing an existing mast and/or site sharing has been explored; and

iii. there is no physical obstruction to aerodrome operations, technical sites, or existing transmitter/receiver facilities."

In line with Policy 24 of NPF4, the proposed development will provide multi-operator 4G coverage which will provide immediate benefits to those in the surrounding area, while also providing a platform of infrastructure capable of adapting and developing as new communications and connectivity opportunities arise in the future.

In line with b) of Policy 24 this development will provide new digital services to areas with little and no digital connectivity.

In accordance with c), the proposed development is part of the National Shared Rural Network (SRN) programme in conjunction with the UK Government, and will provide new digital connectivity to Total Not Spot (TNS) areas.

The development will create multiple benefits to local communities and visitors to the area in terms of the well known opportunities and flexibility that arise from good quality, reliable connectivity, as well as the health and safety benefits which cannot be underestimated in such a remote and rural area such as this. On that basis, the proposed development is in full accordance with Policy 24 d).

The proposed development complies with the requirements of Policy 24 e) on the basis that the visual and amenity aspects have been minimized as much as possible through careful siting and design. Section 5 of this statement confirms the reasons for selecting the proposed site over other locations in the surrounding area. It is considered that the proposed location adjacent to an existing woodland plantation helps to provide some visual screening and backdropping to the development when viewed from the surrounding area. The proposal is outwith any statutory designations and minimises impact on high quality peatland. Effective colouring of the proposed equipment to minimise contrast with the adjacent woodland and absorb the equipment into the environment. There are no existing masts, buildings or other

structures in the area to accommodate the proposed equipment and therefore a new Greenfield mast is justified. On a final note, the development will not cause any physical obstruction to operations in and around the area.

Policy 26 of NPF4 aims to enable alternative ways of working such as home working, live-work units and micro-businesses.

As previously mentioned, the provision of mobile connectivity, especially in area where no existing coverage exists, will enable alternative ways of working and micro-businesses to locate in the surrounding area.

Policy 29 of NPF4 relates to rural developments with the intention of encouraging rural economic activity, innovation and diversification and ensuring that rural communities and businesses are supported. Given the rural nature of the proposal this is another primary policy for consideration. Policy 29 states:

“a) Development proposals that contribute to the viability, sustainability and diversity of rural communities and local rural economy will be supported, including:

- i. farms, crofts, woodland crofts or other land use businesses, where use of good quality land for development is minimised and business viability is not adversely affected;*
- ii. diversification of existing businesses;*
- iii. production and processing facilities for local produce and materials, for example sawmills, or local food production;*
- iv. essential community services;*
- v. essential infrastructure;*
- vi. reuse of a redundant or unused building;*
- vii. appropriate use of a historic environment asset or is appropriate enabling development to secure the future of historic environment assets;*
- viii. reuse of brownfield land where a return to a natural state has not or will not happen without intervention;*
- ix. small scale developments that support new ways of working such as remote working, homeworking and community hubs; or*
- x. improvement or restoration of the natural environment.*

b) Development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. They should also consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location.

c) Development proposals in remote rural areas, where new development can often help to sustain fragile communities, will be supported where the proposal:

- i. will support local employment;*
 - ii. supports and sustains existing communities, for example through provision of digital infrastructure; and*
 - iii. is suitable in terms of location, access, siting, design and environmental impact.*
- d) Development proposals that support the resettlement of previously inhabited areas will be supported where the proposal:*
- i. is in an area identified in the LDP as suitable for resettlement;*
 - ii. is designed to a high standard;*
 - iii. responds to their rural location; and*
 - iv. is designed to minimise greenhouse gas emissions as far as possible.”*

In accordance with Policy 29, the provision of mobile connectivity and digital infrastructure (essential infrastructure), especially in area where no existing coverage exists, will encourage economic activity, innovation and diversification and provide new opportunities and flexibility to rural communities and businesses. The development is considered to be appropriately sited and designed for the setting in order to minimise impact on the character and amenity of the area. The proposal subject of this application will provide this essential digital infrastructure to an area where it doesn't currently exist, in line with Policy 29 of NPF4.

NPF4 is required by law to contribute to 6 outcomes as follows:

Meeting the housing needs of people living in Scotland including, in particular, the housing needs for older people and disabled people,
Improving the health and wellbeing of people living in Scotland,
Increasing the population of rural areas of Scotland,
Improving equality and eliminating discrimination,
Meeting any targets relating to the reduction of emissions of greenhouse gases, and
Securing positive effects for biodiversity

Local Development Plan

The Highland-wide Local Development Plan (HwLDP) Adopted 2012 -
https://www.highland.gov.uk/info/178/development_plans/199/highland-wide_local_development_plan

Policies 45 & 46 are specific to communications developments:

Policy 45 Communications

The Council will support proposals which lead to the expansion of the electronic communications network in Highland. This includes delivery of core infrastructure for telecommunications, broadband and other digital infrastructure.

Policy 46 Siting and Design of Communications Infrastructure

The Council will support proposals for the provision of new communications infrastructure, where:

- equipment and any associated access are sited and designed sensitively to avoid adverse impacts on natural, built and cultural heritage, including landscape character and views;
- existing masts or other structures can not be shared;
- existing services are not interfered with; and
- redundant masts and equipment are removed (without prejudice to their possible re-use elsewhere).

The cumulative visual effect of equipment will also be taken into account when assessing proposals.

In terms of the above policies and the application in front of the Council we would note the following:

The siting and design of communications infrastructure is primarily led by the technical and operational requirements of the equipment.

The proposed site subject of this application is located in an area which has no existing mobile communications coverage and has therefore been designed to provide as much new coverage as possible across the TNS area.

The proposed site is not located in an area nationally designated for landscape value (National Scenic Area) and is located in an area used for commercial forestry. Impacts on the environment; heritage assets and landscape are discussed further below.

There are no existing masts or other structures in the area which would allow EE to obtain the coverage required.

The proposed development would not interfere with any existing services in the area.

Any redundant equipment would be removed from site when it becomes unused.

Scottish Government Planning Guidance

The Scottish Government has published its Planning Guidance on Digital Telecommunications 2023 which replaces Planning Advice Note 62: Radio Telecommunications. The introduction confirms that, *'modern telecommunications and digital connectivity has a central role in unlocking the potential of our places across all of Scotland,'* and that the lack of coverage can disadvantage businesses, communities and individuals, both economically and socially and it can also contribute to deprivation, social isolation and lack of wellbeing. The Scottish Government believe that the Planning System has a role to play in addressing the gaps in

connectivity by supporting the delivery of new digital services and technological improvements, particularly in areas with no or little coverage.

As detailed in paragraph 4.5 of the guidance there are a range of constraints that can affect site selection and the siting and design of communications equipment, including:

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

Paragraph 4.19 suggests various methods that can be used to help mitigate the environmental, landscape and visual impact of a ground based mast, including:

Placing a mast close to similar structures that already contain engineered forms. In rural areas, such as those targeted by the SRN Project, these structures are more likely to come in the form of electricity pylons; power lines, hydro electric infrastructure, wind turbines and roads.

Placing a mast in or adjacent to existing trees – where existing trees or woodland is available, this can provide a very effective way of reducing the visibility of a communications site from the surrounding area, however, care should also be taken to avoid impact on sensitive trees and impacting on future commercial forestry operations.

The use of lattice masts where no visual screening is available. The light-permeable structure of a lattice mast can help to significantly reduce the visual mass and bulk of a development both when backdropped by topography and when viewed against the skyline.

Appropriate colouring. Where a mast is most commonly viewed against the sky, a light grey or galvanised steel is the most appropriate finish to minimise visual contrast, however, masts viewed primarily against a wooded background or rising topography might benefit from being coloured either green or brown.

Where new sections of access track are required to access a communications site, paragraph 4.25 provides the following guidance on how to reduce the impact of the track:

Relate the proposed track to field boundaries and other features;

Follow the boundaries of natural vegetation

Follow the contours of the land and fit in with the landscape

Address land drainage issues

Redressing all cuttings and banks with the existing indigenous vegetation stripped along the route

Avoiding adverse impact on historic environment assets

Using appropriate surface materials and greening of tracks.

Paragraphs 4.36 – 4.43 relate specifically to *'Rural and Remote Rural Areas'* and explains that there are large areas and dispersed communities with little in the way of mobile coverage, including large unpopulated areas where, *'there may be no population but there are visitors and those travelling through on road or rail.'* Some of the benefits of providing mobile coverage to these total and partial not spots include the enablement of technology to serve various applications including agriculture, tourism, emergency services, monitoring protected species, air quality, etc.

Paragraph 4.37 confirms some of the difficulties associated with providing mobile communications services to rural Scotland:

Rugged and mountainous topography can block coverage from one area to another. Difficulties associated with linking a rural site back into the national network, especially in areas with no fibre infrastructure and few existing masts available to connect via Line of Sight transmission links.

The accessibility and availability of power can add significant complexity and expense to the provision of coverage in rural areas.

In accordance with the Scottish Government's Planning Guidance on Digital Telecommunications, the proposed development subject of this application has been sited at a location which benefits from visual screening provided by the adjacent tree plantation to the East. The proposed mast would be painted Fir Green RAL6009 (unless otherwise requested during the processing of the application) in order to minimise visual contrast when viewed alongside the woodland plantation.

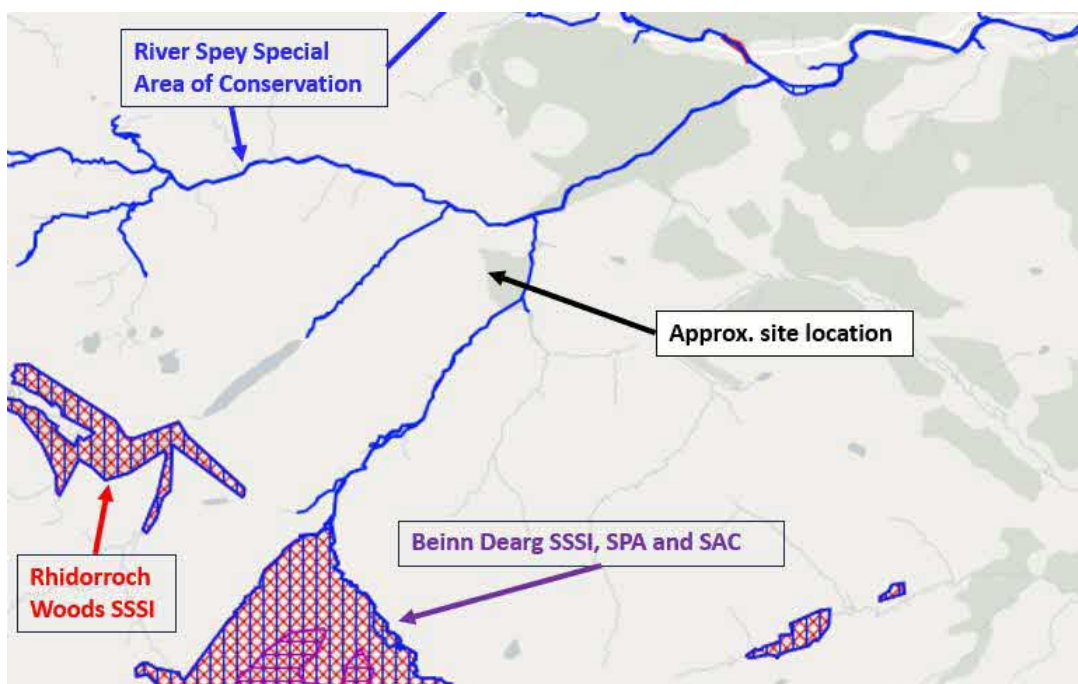
Material Considerations:

Considerations material to this application will be those matters which affect its siting and appearance. The planning policy discussion above takes account of some of these considerations. Whilst the main siting consideration is that of the provision of coverage to the TNS area, below are set out the main factors which affect siting and the assessments made by planning officers in assessing the suitability of that siting, these being:

- Environmental impacts
- Heritage impacts
- Landscape impacts
- Availability of alternative sites with less impacts (inc. existing masts)
- ICNIRP
- Public benefit
- Planning Appeals

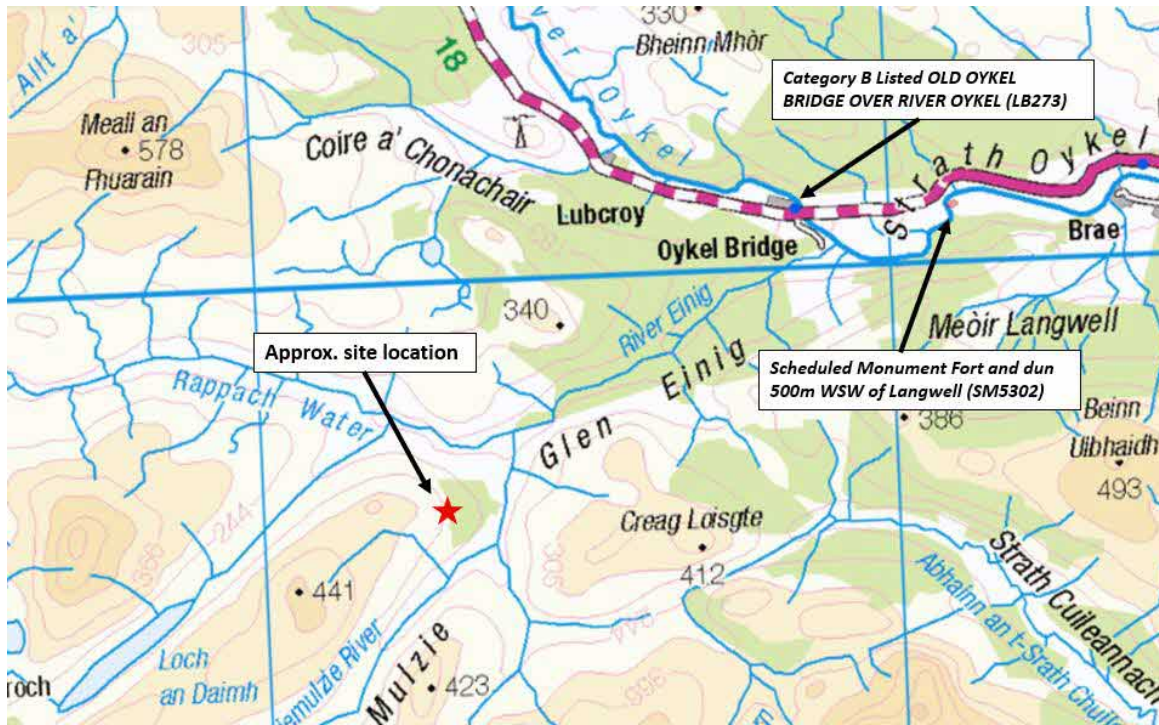
Environmental Impacts

The application site does not lie within any environmental asset, nor would it have any impact on such a designation. However, as can be seen on the extract below from NatureScot's Sitelink website, there are a number of designations across the surrounding land, however the proposed application site has been sited to avoid these:



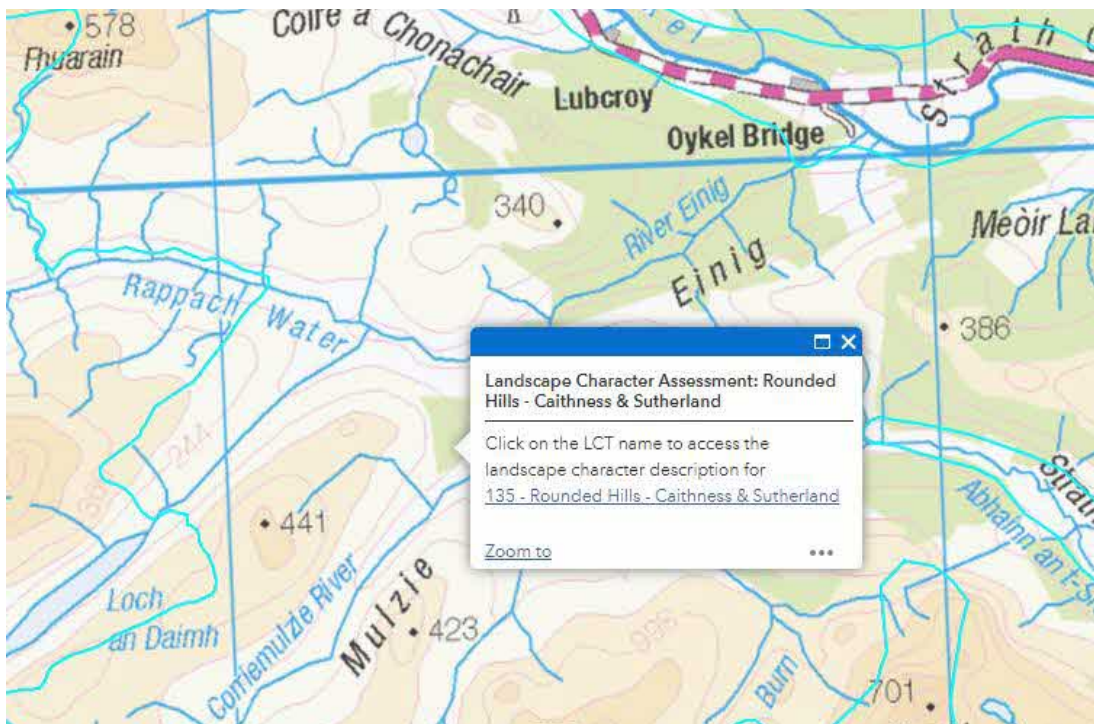
Heritage Impacts

There are few nationally significant heritage assets in the vicinity of the proposed site. The nearest being Category B Listed Old Oykel Bridge over River Oykel, located approximately 7.2km Northeast and Scheduled Monument 'Fort and dun 500m WSW of Langwell', approximately 12km Northeast. The map extract below from Historic Environment Scotland's website illustrates the relationship between the proposed site and surrounding heritage assets:



Landscape Impacts

The proposed mast, at 25 m in height, will have some visual and hence landscape impacts. Using reference to NatureScot's Landscape Character Assessment in Scotland we can see that the application site lies within Landscape Character Type (LCT) No. 135, as shown in the extract below:



As mentioned in Section 3 of this statement, the development is found in a relatively elevated position on a gently rising hillslope adjacent a commercial forestry plantation. This is in keeping with NatureScot's description of the wider 'The Rounded Hills – Caithness and Sutherland' landscape character which highlights key characteristics as rolling hills forming broad, subtly rounded summits, along with hills cut by numerous narrow burns and small lochans lying within dips, corries and on plateau summits and fragments of broadleaf woodland in inaccessible locations. The application site is also just outwith the boundary of within the Rhiddoroch - Beinn Dearg - Ben Wyvis Wild Land Area, which is described by NatureScot as comprising a variety of mountains, both massive and rounded landforms, as well as rockier peaks and ridges, mostly covered by a short mat of vegetation and/or exposed rock.

As previously mentioned, the proposed mast is expected to have some visual impact on the surrounding area due to its height. As discussed previously, the aim of the SRN project is to maximise geographic coverage across the UK to ensure access to high quality communications networks. As with many infrastructure projects form follows function, however in this case, the lattice form which is designed to accommodate the necessary communications equipment while also being structurally suitable for this rural location also has the benefit of being light permeable, thereby ensuring that its form is diffused when viewed against the sky. This open lattice construction helps to minimise visual impact more than a solid, unbroken form such as a wind turbine.

Availability of Alternative Sites

As previously explained this application and site forms part of a rural total not-spot coverage project and by definition, there are unlikely to be either existing masts or tall structures which could accommodate the necessary equipment. Taking into account the Government's need to maximise the geographical coverage that each site will provide, there are few locations available which are technically and operationally viable.

The following points have been reviewed and considered prior to formal site selection:

Existing telecommunications infrastructure – there are none in the area;

Existing tall structure/buildings – there are none in the area;

Environmental assets – looking at the map above it can be seen the proposed site has been sited at a location which avoids these designations;

Heritage assets – there are no historic assets within 7km of the application site.

The proposed mast and ancillary development at this site location will benefit from the visual screening and backdropping provided by the rising hillside to the West in addition to the screening and vertical context provided by adjacent plantation of mature trees. The proposed access using the existing firebreak also minimises tree removal.

Taking the above together it is considered that the proposed siting and appearance is appropriate for the need and location and that it meets the test of planning policy in this regard.

ICNIRP

The proposed development is ICNIRP compliant, and a Certificate confirming compliance accompanies the application.

Public Benefit

As set out in Section 4 above, planning policy seeks to encourage the delivery of improved connectivity whilst minimising impacts. Any impacts identified should be balanced against the public benefit from the proposals.

Planning Appeals

A recent decision by the Planning Inspectorate dated 20 October 2023 to allow an appeal against the refusal of a Shared Rural Network communications site by Northumberland National Park Authority is also considered to be material to this application. The appeal (Ref: APP/T9501/W/23/3324271)⁴ relates to a

⁴ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3324271>

proposed 25m high lattice mast and ancillary development forming part of the Shared Rural Network Project. Paragraph 18 of the Inspector’s decision states:

“18. On the basis of the evidence before me and in the particular circumstances of this case, whilst I give any harm to the NP great weight, the very important contribution the proposed infrastructure would provide to those living, working and visiting this area of Northumberland outweigh the harm that would be caused to the character and appearance of the area, including the landscape and scenic beauty of the NP. As such, even with the identified conflict with development plan policies, there are particularly important and persuasive material considerations that indicate that this development should be approved.”

Summary

The proposed development will provide 4G radio coverage for Three UK specifically to the address the existing coverage not-spot in this rural area. It is required as part of the SRN project designed to bring mobile coverage to rural areas where currently there is none.

Provision of radio coverage can be problematic with very specific geographical and technical requirements. Topography, ownership constraints, trees and forests and the availability of transmission links and power have all shaped the application now in front of the planning authority.

Bearing in mind the geographic coverage required, along with the technical and operational requirements, the design proposed is considered to be the most discreet available.

Impacts on environmental, heritage and landscape designations are limited and are described above. There are no existing masts in the area that would be available for sharing and there are no tall buildings or structures in the area on which the required antennas could be located. On that basis, there is a clear justification for a new Greenfield Mast to address the coverage not-spot in the surrounding area.

It is considered that the siting and appearance of the proposed apparatus is acceptable in this rural area. If the planning authority does consider there to be harmful impacts, these are outweighed by the significant public benefits of the proposal.

We trust this planning supporting statement, appendices and associated information provide enough information and support for the proposals that the planning authority can offer their support and approve the application.

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