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Date: 29<sup>th</sup> February 2024

Dear Sir or Madam

**SHARED RURAL NETWORK – THREE UK – TOTAL NOT SPOT (TNS) PROGRAMME  
FULL PLANNING APPLICATION PROPOSED COMMUNICATIONS DEVELOPMENT AT TN S0015C -  
DROCHAID ALLT A' BHODAICH, LAND NORTHWEST OF LOCH QUOICH, KINLOCHHOURN,  
INVERGARRY, HIGHLAND, PH35 4HD**

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 22.5m high lattice tower accommodating 3no. antennas, 4no. 0.6m transmission dishes and ancillary development in an 8.3x12m compound surrounded by a deer fence enclosure and gabion walls. The proposed compound will accommodate 10No ground based equipment cabinets, 1No meter cabinet, 1No off grid power generator and fuel tank and ancillary development. The off-grid power solution also involves the installation of 2No 15m high wind turbines to the North and West, and the installation of 36No solar panels within a compound to the South of the main site compound. The proposed new compound will be accessed via a proposed 150m long ATV track from the existing public road to the North.

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

Full Planning Application Forms

Site Location Plan ref: TNS0015C\_HLD729\_GA\_REV\_B – 002A SITE LOCATION PLAN SHEET 1

Site Access Plan ref: TNS0015C\_HLD729\_GA\_REV\_B – 002C SITE LOCATION PLAN SHEET 3

Site Plan ref: TNS0015C\_HLD729\_GA\_REV\_B – 210 PROPOSED SITE PLAN

Site Elevation A ref: TNS0015C\_HLD729\_GA\_REV\_B – 260 PROPOSED SITE ELEVATION EAST

Site Elevation B ref: TNS0015C\_HLD729\_GA\_REV\_B – 261 PROPOSED SITE ELEVATION NORTH

Site Elevation C ref: TNS0015C\_HLD729\_GA\_REV\_B – 262 PROPOSED SITE ELEVATION SOUTH

Planning and Design Supporting Information

[REDACTED]  
Landscape and Visual Impact Assessment, inc. Photomontages (to follow)

Zone of Theoretical Visibility (ZTV) (to follow)

Peatland Assessment (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**

Mitie | 35 Duchess Road, Rutherglen, Glasgow, G73 1AU  
[REDACTED]

Email: [Hannah.Morrison@mitie.com](mailto:Hannah.Morrison@mitie.com)

(For and on behalf of Three UK)



## PLANNING AND DESIGN SUPPORTING INFORMATION

### 1. Site Details

Site Name:	Drochaid Allt a'Bhodaich	National Grid Reference:	196977, 803845
Site Address:	Land north west of Loch Quoich, Kinlochhourn, Invergarry, Highland, PH35 4HD		
Site Ref Number:	TNS0015C	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	<b>No</b>
If no explain why:	It is considered that the industry specific Mast Data website ( <a href="https://mastdata.com/">https://mastdata.com/</a> ) 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:	<b>Yes</b>	No
If no explain why:	n/a	

### Site Specific pre-application consultation with Local Planning Authority:

Was there pre-application contact:	<b>Yes</b>
Date of pre-application contact:	21.12.23
Name of contact:	Karolina Slotwinska
Summary of outcome/Main issues raised:	<p>Pre-application consultation reference: 23/05915/PREAPP was submitted to Highland Council on the 8<sup>th</sup> of December 2023. The proposal presented in the initial pre-application enquiry is largely the same as the proposal presented as part of this planning application, with only minor changes such as the size of the proposed compound for the solar array. We received acknowledgement from the LPA on 21.12.23 which confirmed that the enquiry had been allocated to a case officer. We received an email from Karolina advising the following:</p> <p><i>"I'm the case officer dealing with this request however, please understand that we are dealing with significant volume of applications and I have to prioritise planning applications over pre-application requests. I am assuming that you are gathering further information which will be necessary to proceed with planning application for the proposal. The application site lies within designation areas therefore the proposal will need to be assessed against those special land qualities and it won't be a straightforward assessment."</i></p>

	<p><i>Unfortunately, I can't give you a timeline for more detailed response. Please accept this brief message and submit a planning application once you are ready or alternatively, await for proper advice which will follow in due course.</i></p> <p>To date, no further comments have been received regarding the proposal. We understand that Local Planning Authorities are extremely busy at the moment, however as the Government's target for 95% 4G coverage across the UK by 2025 is fast approaching, we felt any information requested by the LPA could be dealt with during the course of the application in order to minimise further delays. To confirm, we will provide the Local Planning Authority with a Landscape Visual Impact Assessment (which will include Photomontages and ZTV) and a Peatland Assessment to assist in the determination of this application. Three UK are keen to ensure that communication channels remain open and will be responsive to any feedback that is received.</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 08.12.23 with a request for feedback, comments and queries prior to the submission of a formal planning application:</p> <p style="padding-left: 40px;">Councillors for Caol and Maillaig: Andrew Baldrey; John Grafton; and Liz Sagers Councillors for Wester Ross, Strathpeffer and Lochalsh: Chris Birt; Isabelle Campbell; Liz Craft; and Patrick Logue Invergarry 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

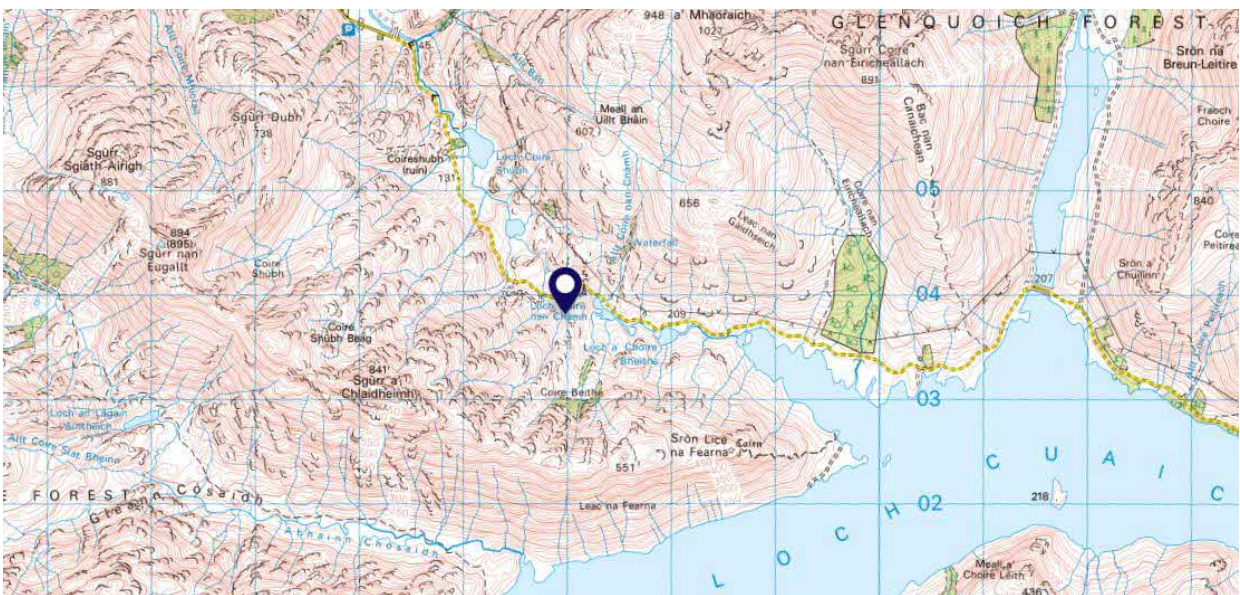
<p>Location of site in relation to school/college (include name of school/college): There are no schools or colleges in the vicinity of the proposed site.</p>
<p>Outline of consultation carried out with school/college (include evidence of consultation): n/a</p>
<p>Summary of outcome/main issues raised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

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

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

3. Proposed Development

The proposed site:  
The proposed site is located at Drochaid Allt a' Bhodaich, Land Northwest of Loch Quoich, Kinlochhourn, Invergarry, Highlands, PH35 4HD, NGR: 196977, 803845



Site Photographs



The proposed site is located to the North of Loch Quoich, a predominantly upland area of the Highlands, approximately 13km West of Coille Mhorgil and 15km Southeast of Shiel Bridge. The site is found in a remote, natural landscape on the northern foot of Sgurr a Chlaidheimh at approx. 243m ASL. A single-track public road (which branches off of the A87 some 20km to the East) is located to the North of the site location and connects Kinloch Hourn in the West to Coille Mhorgil to the East, with only a short section of ATV track (150m) proposed from the existing public road to the development site.

The landscape at the application site is dominated by a number of steep peaks, mountains and valleys which surround Loch Quoich. The surrounding area encompasses a diverse range of habitats including heather and rough grassland, montane heaths, exposed rock, scree and more craggy ground at higher altitudes as well as a large freshwater loch to the East and a number of smaller river systems. This is in line with the NatureScot Landscape Character Types '*Interlocking Sweeping Peaks – Lochaber*', which identifies key characteristics such as distinctive pyramidal peaks, steep sweeping slopes, sparse vegetation, rock outcrops, deep glens and lochs. All of which can be found in the vicinity of the TNS00 development, owing to its remote setting that makes for a landscape that is highly challenging for the provision of modern telecommunications infrastructure. Much of the surrounding landscape is also categorised as being within the Kinlochhourn - Knoydart – Morar Wild Land area which covers approximately 106,000 hectares of land in this part of the Highland by virtue of its wide range of high, rocky and rugged mountains and striking features as well as cascading waterfalls and watercourses. Any potential impacts on the aforementioned WLA will be discussed and assessed in the forthcoming Landscape and Visual Impact Assessment.

According to the NatureScot designation map, the proposed development site is located within the Knoydart National Scenic Area, a 39,500-hectare land designation covering the entire Knoydart peninsula. Despite the proposed development location within a National Scenic Area, large overhead pylons can be seen dominating the northern side of the glen before running alongside the existing public road back to the A87 to the East. A small-scale Estate tower with associated wind turbine and solar array can also be found approximately 190m northeast of the proposed development site, creating an existing vertical prominence in the landscape. Water intakes, bridges and built infrastructure are also found near the existing public road and proposed development site, further reinforcing the areas suitability for a similar development. Therefore, it was considered that the development proposal will not have detrimental effects on the area or the wider National Scenic Area due to its careful siting close to an existing road and presence of existing built features in the area.

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 22.5m high lattice tower accommodating 3no. antennas, 4no. 0.6m transmission dishes and ancillary development in an 8.3x12m compound surrounded by a deer fence enclosure and gabion walls. The proposed compound will accommodate 10No ground based equipment cabinets, 1No meter cabinet, 1No off grid power generator and fuel tank and ancillary development. The off-grid power solution also involves the installation of 2No 15m high wind turbines to the North and West, and the installation of 36No solar panels within a compound to the South of the main site compound. The proposed new compound will be accessed via a proposed 150m long ATV track from the existing public road to the North.

Overall Mast Height:	22.5m
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**Equipment Housing:**

- 1No Meter Cabinet – 1500x490x1200mm – Fir Green RAL6009
- 1No Ericsson RBS6130 – 650x700x1100mm – Fir Green RAL6009
- 1No Alifabs Viper – 600x600x1750mm – Fir Green RAL6009
- 3No Off Grid Cabinet – 800x850x2100mm – Fir Green RAL6009

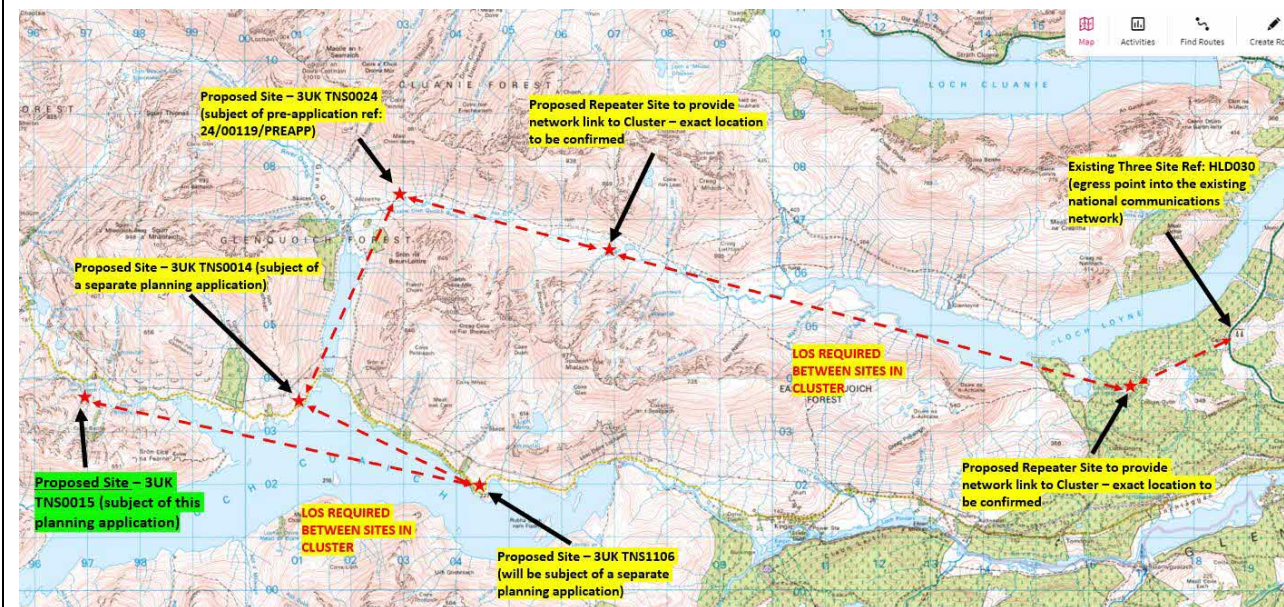
<ul style="list-style-type: none"> <li>• 1No ICD EE AIRO DC – 750x700x2100mm – Fir Green RAL6009</li> <li>• 1No Vertiv EE M35 PSU – 730x750x1800mm – Fir Green RAL6009</li> <li>• 1No Allfabs EE Viper – 600x600x1750mm – Fir Green RAL6009</li> <li>• 1No VF Power / BBU Cabinet – 823x640x1721mm – Fir Green RAL6009</li> <li>• 1No VF RRU Rack – 750x700x2100mm – Fir Green RAL6009</li> </ul>	
Materials (as applicable):	
Tower/mast etc. – type of material and external colour:	The proposed lattice mast would be constructed from galvanised steel which will naturally dull down to a matt light grey colour over time.
Equipment housing – type of material and external colour:	The proposed equipment housing would be coloured 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.

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.

Three UK have confirmed that the proposed mast height of 22.5m at this location is the minimum height possible to provide the necessary level of TNS pixel coverage uplift along this area of the Highlands while also gaining a clear LOS from the adjacent site in the Cluster to the East (in this case, TNS1106), as referenced below:



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 from surrounding viewpoints.

The proposed mast and ancillary development at this location will benefit from the visual screening and backdropping provided by the surrounding rising hillsides, in addition to the screening and vertical context provided by the existing built infrastructure in the area, including the large overhead pylons and existing

Estate communication tower with ancillary wind turbine and solar array in the vicinity. Due to the character of the landscape in this area and the lack of existing tree cover or screening opportunities, there is little in the way of visual screening and backdropping available, however, the selected light permeating lattice structure will help to minimise the impact on the skyline when viewed from the surrounding area.

ICNIRP compliance

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

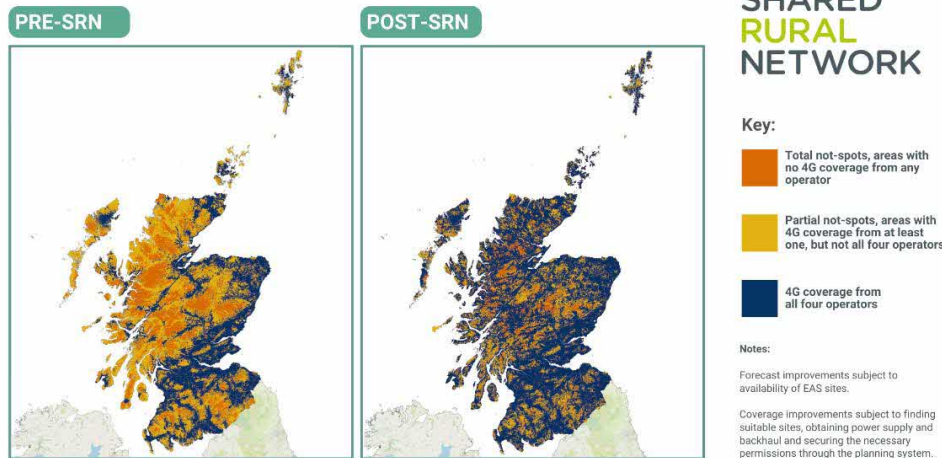
#### 4. Technical Justification

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:

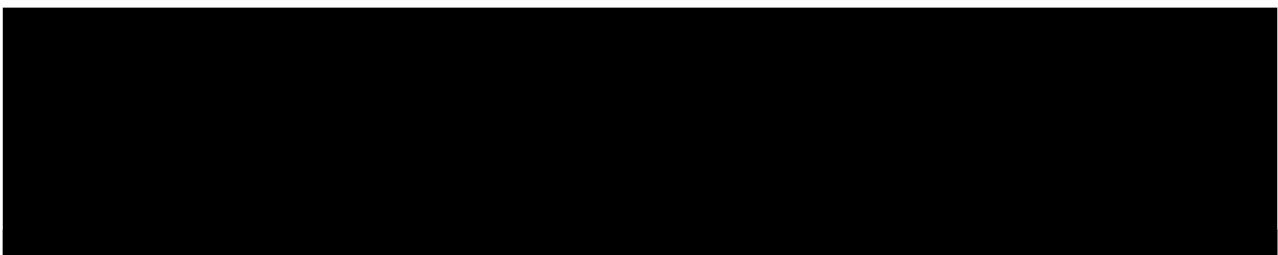
#### SHARED RURAL NETWORK Coverage Forecast Improvements in Scotland



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



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.





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"<sup>1</sup> 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%.

<sup>1</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0033/267594/SummerUpdate2023Final.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0033/267594/SummerUpdate2023Final.pdf)

In 2018, recognising the increasing importance of Digital Communications to everyday life, the UK Government published the Future Telecoms Infrastructure Review in July 2018<sup>2</sup>. 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 2016<sup>3</sup> 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.”*

<sup>2</sup> [https://assets.publishing.service.gov.uk/media/5b6aa54d40f0b62ea600fd39/Future\\_Telecoms\\_Infrastructure\\_Review.pdf](https://assets.publishing.service.gov.uk/media/5b6aa54d40f0b62ea600fd39/Future_Telecoms_Infrastructure_Review.pdf)

<sup>3</sup> <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>

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

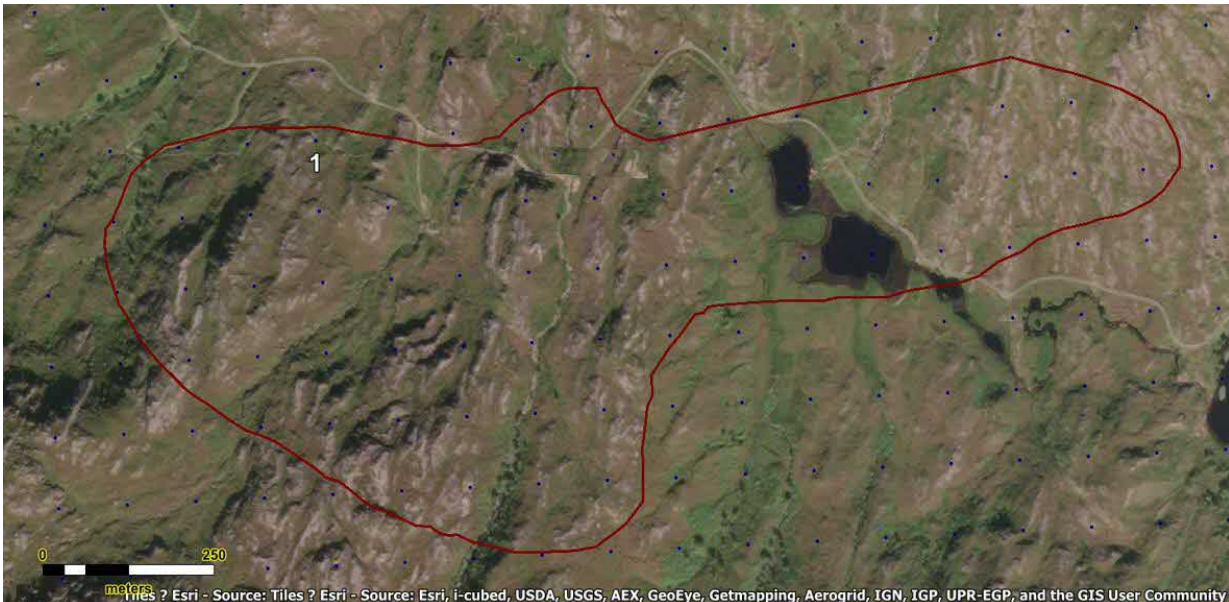
*“SG and the mobile operators are committed to working together on a range of measures air mobile coverage across Scotland. We will identify where the gaps will be after commercial rollout and jointly design technology solutions and business models that will allow services to be delivered by operators 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.

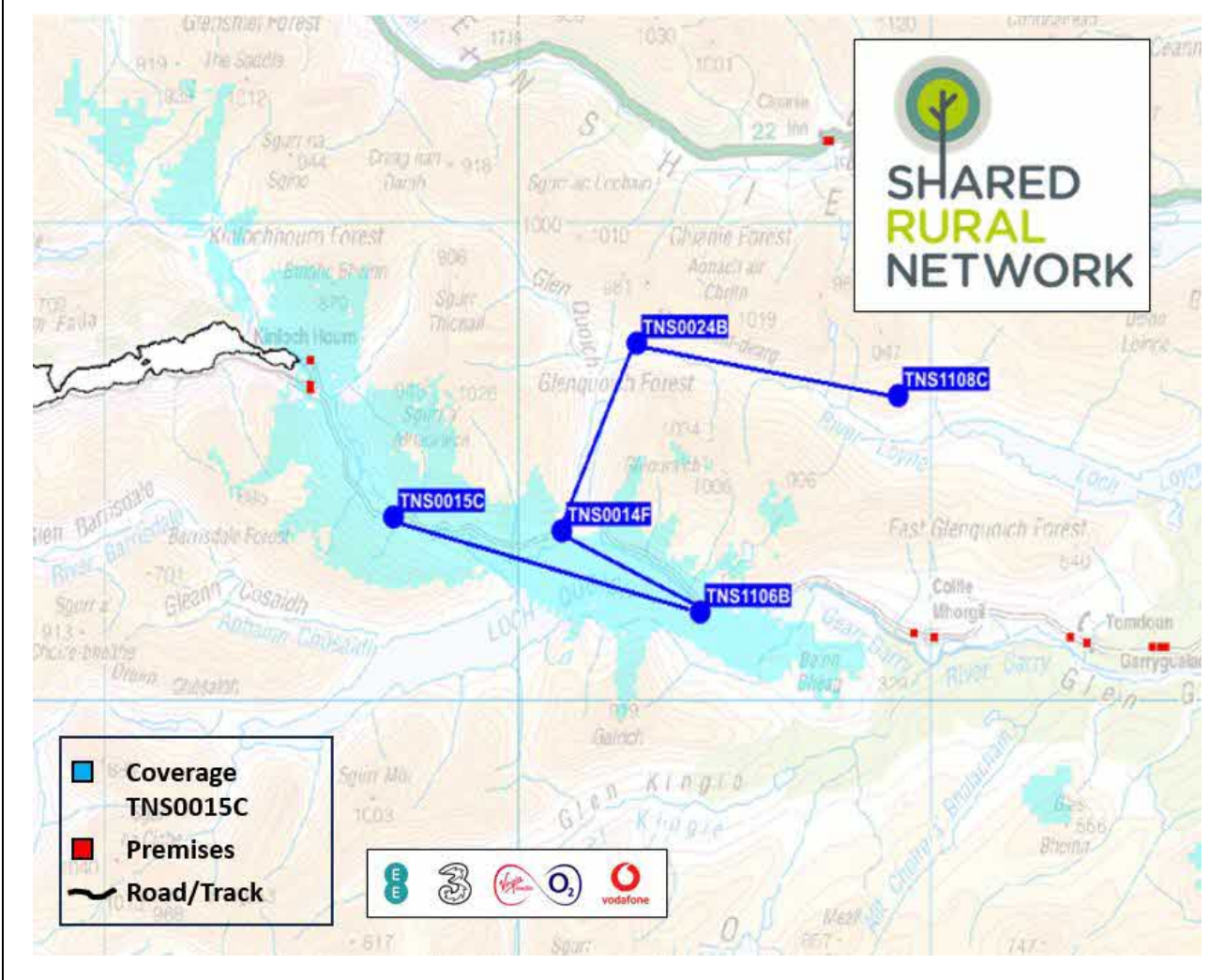
Search Area and Site Specific TNS Coverage Uplift

The search area for TNS0015 is illustrated by the red line shown on the aerial image below. The blue dots (pixels) on the aerial 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 red line is created by a topographical mapping tool that defines all areas of land which are theoretically visible from an existing communications site in the wider area (visibility polygon). Due to the very remote nature of these sites, they will rely on having clear line of sight (LOS) to link back to the national network using transmission dishes on the mast. In this case, the network link is from the adjacent proposed site TNS1106, which forms part of the wider Cluster 4 and will be subject of a separate planning application.



The following coverage plot illustrates the new 4G coverage that will be provided for all Operators solely from the development subject of this application, TNS0015. As illustrated by the blue shaded areas on the plan below there will be a significant uplift in 4G coverage for all Operators surrounding Total Not Spot (TNS) areas including vast areas of surrounding Estate land, a large section of the single-track public road that connects Kinlochhourn in the West to Coille Mhorgil in the East, a number of properties in Kinlochhourn (namely Lochhournhead accommodation (B&Bs and Self Catering Accommodation) and tearoom), as well as various walking routes to nearby peaks. While

there may be only few existing businesses or residential properties in the areas 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, particularly given the majority of the existing public road would benefit from new 4G coverage. The coverage plot includes the proposed locations of the other site in this TNS Cluster, however these will be subject of separate applications and will provide their own coverage uplift to surrounding TNS areas.



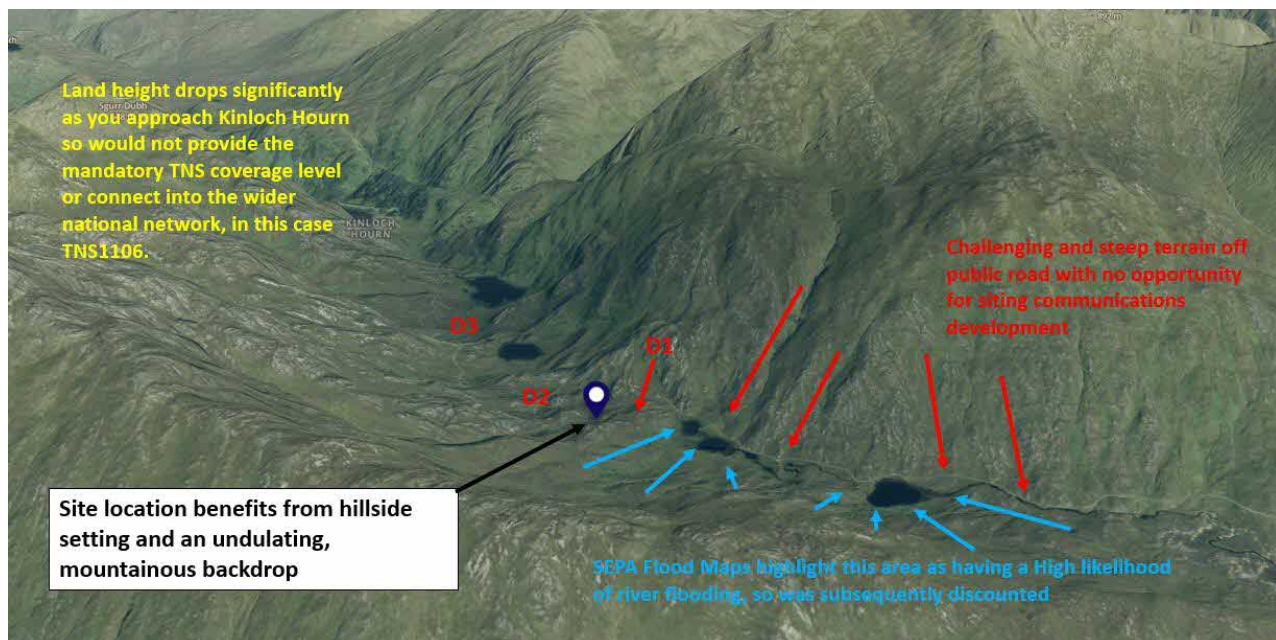
## 5. Site Selection Process

Alternative sites considered and not chosen:

Map Ref:	Site Location	NGR	Reason for Discounting
D1	Existing Communications tower approx. 190m NE of development	197080 , 804007	The small, legacy BT communications site located approx. 190m NE of the proposed site location was considered for upgrade, however, it was confirmed the current pole-type structure was not capable of accommodating the required equipment to support all four mobile network operators (such as antennas, dishes, etc.), coupled with a lack of available ground space for an off-grid power solution, a site further to the South was chosen as it benefitted from good visual backdropping provided by the steep rising hillsides and minimised the length of new access track required by siting as close as technically possible to the public road in order to gain the required elevation and a clear Line of Sight over surrounding hilltops.

n/a	Existing Airwave Communications tower approx. 7.5km East of development (NOR299A)	204386 , 801923	This existing Airwave communications site was considered however, it was confirmed the location and position of the mast to the North of Loch Quoich was not technically capable of connecting the wider cluster of sites into the national network or provide the mandatory level of TNS coverage pixels. We understand a planning application (under Planning ref: 23/05742/TPNO) has been submitted to Highland Council on behalf of the Home Office for a 30m tower as a co-location to the existing Airwave tower , however this would not be technically suitable to link into the adjacent sites in this Cluster . This site is outside the search area and not visible on the discounted sites map below.
D2	Drochaid Allt a' Bhodaich	Various	An option directly off the existing public road was considered however, following a review with Radio and Transmission specialists it was confirmed a mast of a substantially greater height would be required in order to gain elevation over significant physical landforms and achieve a clear Line of Sight to adjacent sites in the cluster, namely TNS1106.
D3	On approach to Kinlochhourn	Various	This area was explored for potential siting options, however it was clear given the significant drop in land height that any proposed mast development would need to be of a significant height in order to gain a clear Line of Sight to adjacent sites in the cluster. Along with the progressively challenging and winding access on approach to Kinlochhourn, it was considered a site further to the East was more appropriate as it minimises the total height of a new development and avoid any supporting works to the existing public road.

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 measures to conserve, restore and enhance biodiversity, in accordance with national and local 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 public road as possible with only a short ATV track of 150m proposed to ensure the least amount of disruption to the surrounding land during the site construction and ongoing maintenance of the site.

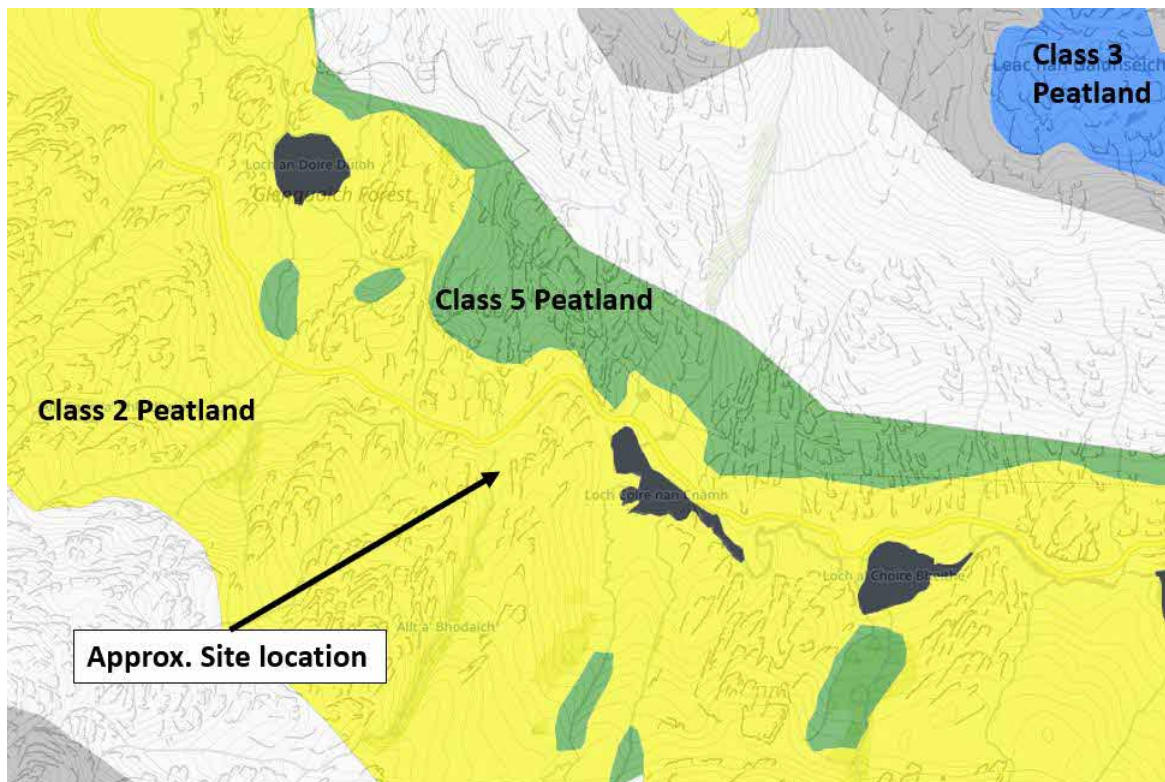
Policy 4 aims to protect, restore and enhance natural assets across Scotland. It confirms that where development proposals have a potential to affect locally, regionally, nationally or internationally important natural assets, they will only be supported where the overall integrity of the areas will 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 as Wild Land by NatureScot and confirms that development will only be supported where it; *“i. will support meeting 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, 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 people 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, particularly in Kinlochhourn and especially in terms of health and safety relating to remote working, 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. A more detailed Wild Land Assessment will form part of forthcoming LVIA.

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.”*

The proposed site subject of this development is located in the Class 2 Category on NatureScot’s

Carbon and Peatland Map 2016 which is described as areas where nationally important carbon-rich soils, deep peat and priority peatland habitat and areas of potentially high conservation value and restoration potential are present. An annotated extract of the Carbon and Peatland Map 2016 at the proposed site location is provided below:



Policy 11 of NPF4 relates to Energy and aims to *'encourage, promote and facilitate all forms of renewable development'* including small scale renewable energy generation technology; solar arrays and proposals including the co-location of these technologies.

In accordance with Policy 11 above, the proposal subject of this development includes a small scale, off-grid renewable energy scheme including wind turbines and solar arrays. It is considered that this will vastly improve the sustainability of the site and provides a contemporary solution in line with the Local Authorities' wider goals to promote renewable forms of energy.

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. It is also of note that there are a number of tourist spots in the vicinity, including Lochhourhead accommodation (B&Bs and Self Catering Accommodation) and a tearoom. It is considered the connectivity provided will support these businesses and also enable them to work more efficiently without the need for travel.

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 which is overlooked by steep hills of significant height allows the mast to blend into the wider landscape and avoids becoming an overly dominant feature. The proposal is located within the Knoydart National Scenic Area however it is considered that the proposal minimises the impact on the designated land and minimises impact on high quality peatland by siting as close as technically possible to the existing road. Effective colouring of the proposed equipment to minimise contrast with the surrounding areas which further helps to absorb the equipment into the environment. There are no suitable 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 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](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.

Impacts on the environment; heritage assets and landscape are discussed further below.

There are no suitable existing masts or other structures in the area which would allow Three UK 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 in December 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 p: 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 Sigf transmission links.
- The accessibility and availability of power can add significant complexity and expense to the provision of coverage in rural areas.

Paragraph 4.42 explains that in areas where a mains power source is not achievable, then solar arrays might be an appropriate solution and would work in tandem with a long-life battery and back up generator. A solar array solution would significantly reduce the carbon footprint of running a base station and could avoid the need for new overhead lines or underground trenching to be installed.

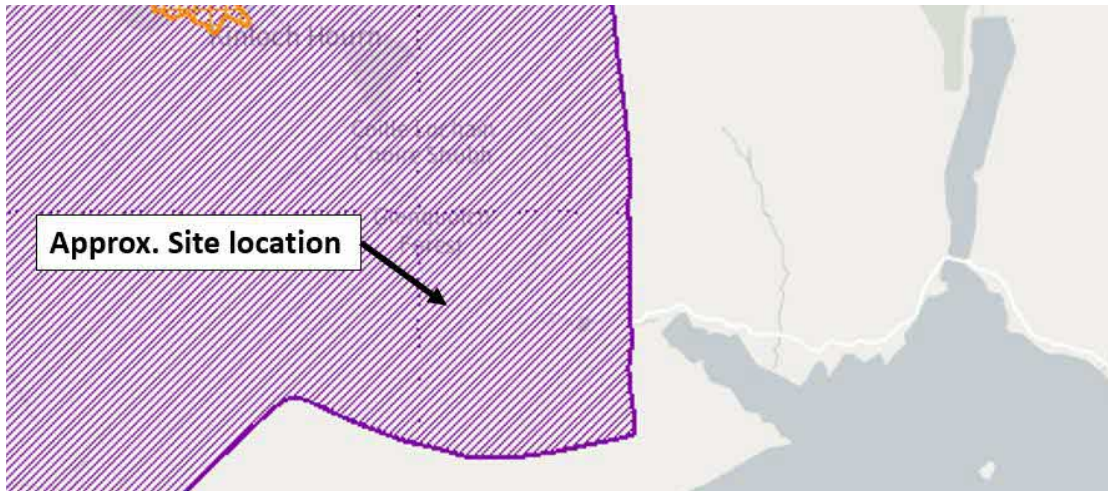
In accordance with the Scottish Government’s Planning Guidance on Digital Telecommunications, the proposed development subject of this application has been placed at a location adjacent to an existing access track where the mast would benefit from the visual backdropping provided by the rising hillsides. The proposed mast would be coloured in a recessive brown colour (unless otherwise requested during the processing of the application) in order to minimise visual contrast when viewed against the surrounding landscape from the wider area.

### **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

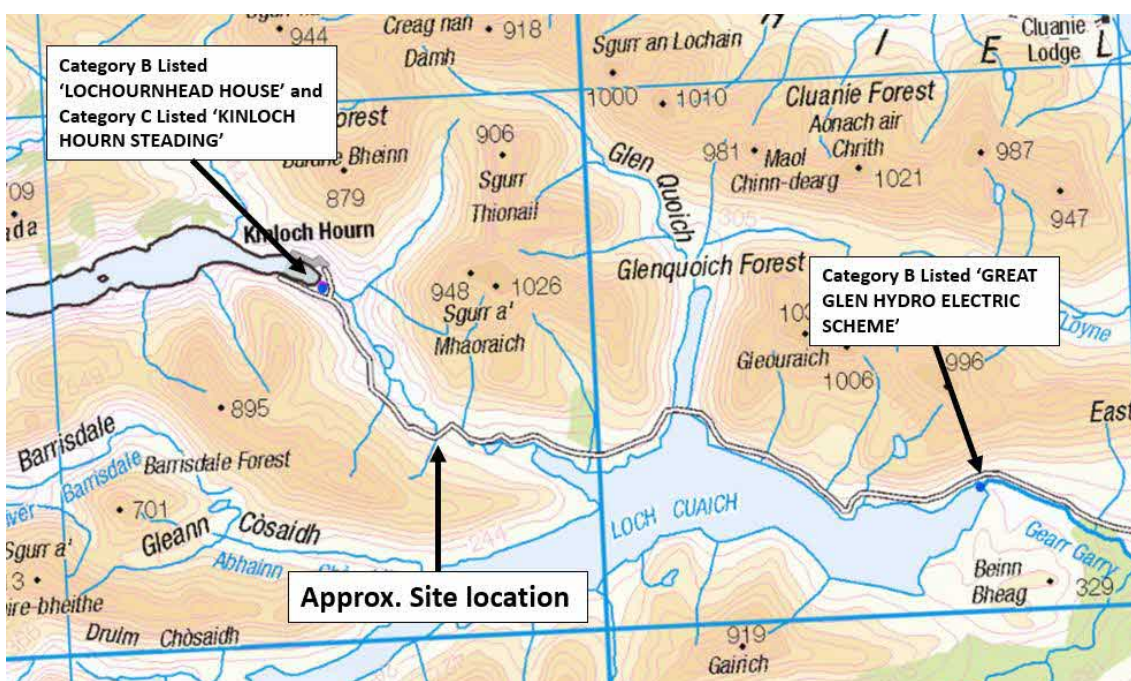
## Environmental Impacts



As the above extract shows, the development site is located within the Knoydart National Scenic Area and is not subject to any other statutory designations. Knoydart is known for its remote nature and is characterised by its extensive terrain of rough, rugged, harsh, bare rock, cliff and scree. Efforts have been made to ensure the least potential visual harm to the National Scenic Area as possible. Firstly, there were no other appropriate sites or existing structures that could be utilised due to technical constraints, as discussed above. Furthermore, the development site has been positioned adjacent to steep, craggy hills which will allow the development proposal to blend into the wider landscape and avoid becoming an overly dominant feature. The development proposal also makes use of the existing public road and proposes only a short section of new ATV track. Again, this ensures the least possible disruption to the ground and wider area. Taking all matters into account, it is considered that efforts have been made to ensure the least possible harm to the designated area and the development proposal is appropriate in this case.

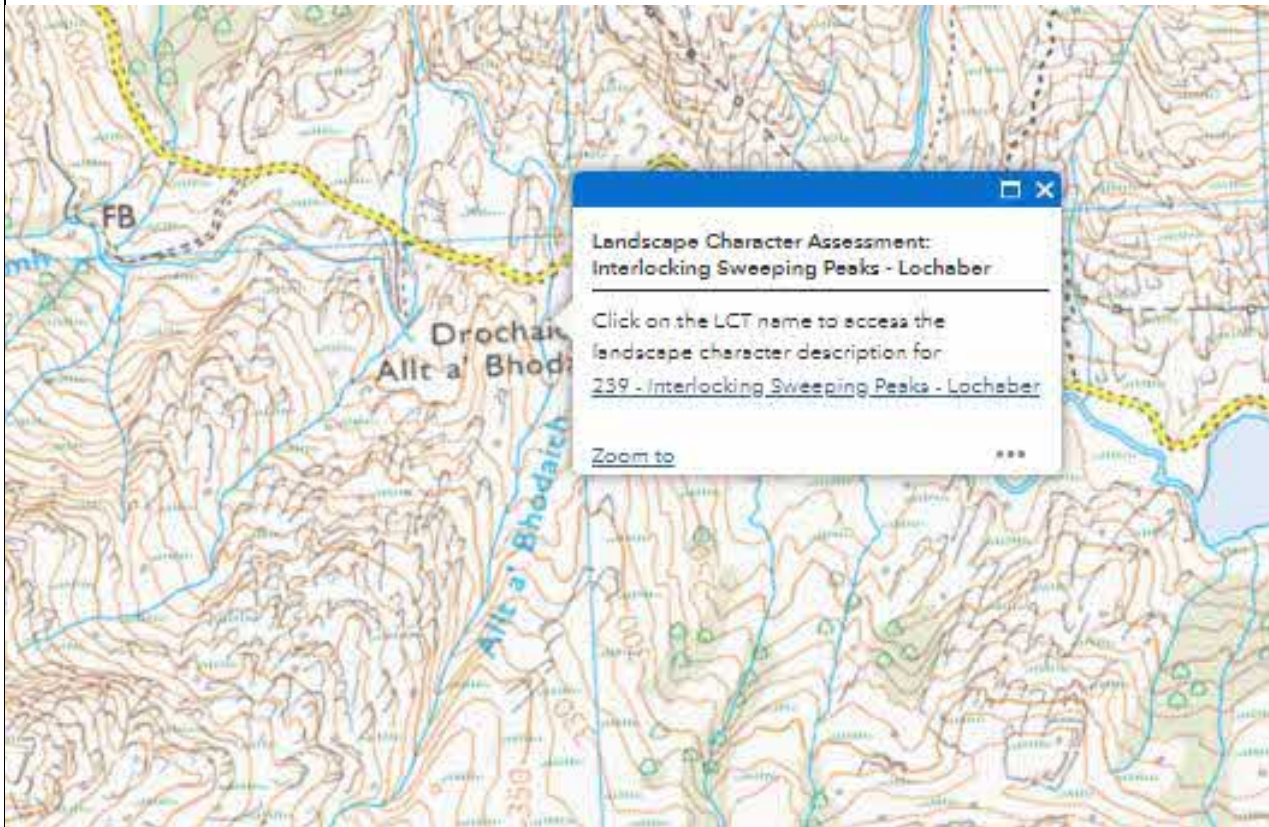
## Heritage Impacts

There are few nationally significant heritage assets in the vicinity of the proposed site. The map extract below from Historic Environment Scotland's website demonstrates that there are no heritage assets in proximity to the development site:



### Landscape Impacts

The proposed mast, at 22.5 m in height along with the proposed wind turbines at 15m each, 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. 239 '*Interlocking Sweeping Peaks – Lochaber*', as shown in the extract below:



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 from surrounding viewpoints.

When viewed within its surrounding context, it is considered that the proposed development will be appropriate to the landscape. The development will be positioned adjacent to surrounding steep hills and would be seen alongside an existing Estate communications pole, wind turbine and solar panels. When viewed against this backdrop, it is considered that the development will not become an overly dominant feature. Furthermore, the presence of existing built infrastructure in the form of pylons ensures that the new, similar development proposed will be seen appropriately in the landscape.

### 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 no existing communications sites in the area that would be suitable for sharing.

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

Environmental assets – looking at the map above it can be seen that the National Scenic Area covers the TNS target area and it is note therefore technically feasible to avoid this designation. The proposed site has been sited at a location to minimize harm on the National Scenic Area by being located close to hills and existing tracks.

Heritage assets – there are none in proximity to the development site.

A number of areas were assessed close to the existing track and the possibility of making use of already existing structures was also explored. In conducting the site search and subsequent detail assessments, it has been established that these usually preferable sites were not plausible in this instance. As such, it is considered that the most appropriate option from a technical and planning perspective as proposed as part of this submission.

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)<sup>4</sup> relates to a 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.

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

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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