

# NOTICE OF REVIEW

UNDER SECTION 43A(8) OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT  
1997 (AS AMENDED) IN RESPECT OF DECISIONS ON LOCAL DEVELOPMENTS

THE TOWN AND COUNTRY PLANNING (SCHEMES OF DELEGATION AND LOCAL REVIEW  
PROCEDURE) (SCOTLAND) REGULATIONS 2013

THE TOWN AND COUNTRY PLANNING (APPEALS) (SCOTLAND) REGULATIONS 2008

**IMPORTANT: Please read and follow the guidance notes provided when completing this form. Failure to supply all the relevant information could invalidate your notice of review.**

**Use BLOCK CAPITALS if completing in manuscript**

| Applicant(s)        |   | Agent  |   |
|---------------------|---|--|---|
| Name                | EE Ltd & Hutchison 3G UK Ltd            | Name   | Guy de Rose   |
| Address             | Thames Tower<br>Station Road<br>Reading | Address  | WHP Telecoms Ltd,<br>1a Station Court,<br>Station Road,<br>Guiseley,<br>Leeds |
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|                     |   | Mark this box to confirm all contact should be<br>through this representative: <input checked="" type="checkbox"/> |   |

\*Do you agree to correspondence regarding your review being sent by e-mail? Yes

Planning Authority **Perth and Kinross**

Planning authority's application reference number 25/00794/FLL

Site address Pitheavlis  
Necessity Brae  
Perth  
PH2 0PZ

Description of proposed development

Proposed 25.0m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works.

Date of application 28/05/2025

Date of decision (if any) 01/07/2025

Note. This notice must be served on the planning authority within three months of the date of the decision notice or from the date of expiry of the period allowed for determining the application.

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### Nature of application

- |    |   |                                     |
|----|---|-------------------------------------|
| 1. | Application for planning permission (including householder application)   | <input checked="" type="checkbox"/> |
| 2. | Application for planning permission in principle  | <input type="checkbox"/>            |
| 3. | Further application (including development that has not yet commenced and where a time limit has been imposed; renewal of planning permission; and/or modification, variation or removal of a planning condition) | <input type="checkbox"/>            |
| 4. | Application for approval of matters specified in conditions   | <input type="checkbox"/>            |

### Reasons for seeking review

- |    |  |                                     |
|----|--|-------------------------------------|
| 1. | Refusal of application by appointed officer  | <input checked="" type="checkbox"/> |
| 2. | Failure by appointed officer to determine the application within the period allowed for determination of the application | <input type="checkbox"/>            |
| 3. | Conditions imposed on consent by appointed officer   | <input type="checkbox"/>            |

### Review procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may mark more than one box if you wish the review to be conducted by a combination of procedures.

- |    |  |                                     |
|----|--|-------------------------------------|
| 1. | Further written submissions                                    | <input type="checkbox"/>            |
| 2. | One or more hearing sessions                                   | <input type="checkbox"/>            |
| 3. | Site inspection  | <input type="checkbox"/>            |
| 4. | Assessment of review documents only, with no further procedure | <input checked="" type="checkbox"/> |

If you have marked box 1 or 2, please explain here which of the matters (as set out in your statement below) you believe ought to be subject of that procedure, and why you consider further submissions or a hearing are necessary:

|  |
|--|
|  |
|--|

### Site inspection

In the event that the Local Review Body decides to inspect the review site, in your opinion:

1. Can the site be viewed entirely from public land? Yes
2. Is it possible for the site to be accessed safely, and without barriers to entry? Yes

If there are reasons why you think the Local Review Body would be unable to undertake an unaccompanied site inspection, please explain here:

## Statement

You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. Note: you may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

If the Local Review Body issues a notice requesting further information from any other person or body, you will have a period of 14 days in which to comment on any additional matter which has been raised by that person or body.

State here the reasons for your notice of review and all matters you wish to raise. If necessary, this can be continued or provided in full in a separate document. You may also submit additional documentation with this form.

Grounds of Appeal Statement Document being submitted

Have you raised any matters which were not before the appointed officer at the time the determination on your application was made? Yes ☐ No ☒

If yes, you should explain in the box below, why you are raising new material, why it was not raised with the appointed officer before your application was determined and why you consider it should now be considered in your review.

## List of documents and evidence

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review.

1\_NTQ 33480 Covering letter  
2\_NTQ 33480 Grounds of Appeal  
3\_NTQ 33480 ICNIRP Certificate  
4\_NTQ 33480 Letter to Site Provider  
5\_NTQ 33480 SSSI  
6\_NTQ 33480\_Location Plan  
7\_NTQ 33480\_SP Delivered

8\_NTQ 33480\_SP Sent  
9\_Pages 01 to 5 001a\_visualisations  
10\_Pages 06 to 10 001a\_visualisations  
11\_Pages 11 to 15 001a\_visualisations  
12\_Pages 16 to 19 001a\_visualisations  
13\_PAK282\_33480\_PH1441\_M002\_LPA  
14\_Planning Permission Application  
15\_FLL\_DECISION\_NOTICE  
16\_FLL\_REPORT\_OF\_HANDLING

Note. The planning authority will make a copy of the notice of review, the review documents and any notice of the procedure of the review available for inspection at an office of the planning authority until such time as the review is determined. It may also be available on the planning authority website.

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## Checklist

Please mark the appropriate boxes to confirm you have provided all supporting documents and evidence relevant to your review:

- ☒ Full completion of all parts of this form
- ☒ Statement of your reasons for requiring a review
- ☒ All documents, materials and evidence which you intend to rely on (e.g. plans and drawings or other documents) which are now the subject of this review.

Note. Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice from that earlier consent.

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## Declaration

**I the applicant/agent [delete as appropriate] hereby serve notice on the planning authority to review the application as set out on this form and in the supporting documents.**

Signed: Guy de Rose

Date: 22/08/2025



# **WHP Telecoms Ltd**

**NTQ (NOTICE TO QUIT) REPLACEMENT SITE**

**Telecommunication Appeal**

**for**

**MBNL**

**(EE / 3UK and ESN – Emergency Services Network)**

**at**

**Pitheavlis,  
Necessity Brae,  
Perth,  
Perth and Kinross,  
PH2 0PZ**

**Appeal Statement**

**Date: 19<sup>th</sup> August 2025**

Prepared by WHP Ltd  
[www.whptelecoms.com](http://www.whptelecoms.com)

**Agents Ref: NTQ 33480**

## **MBNL (EE / 3UK and ESN – Emergency Services Network)**

NTQ (Notice to Quit) proposed telecommunications installation. Proposed 25.0m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works at Pitheavlis. Necessity Brae, Perth, Perth and Kinross, PH2 0PZ.

Appeal Statement of Case.

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**8.0 Conclusions and Planning Balance**

## Introduction:

- 1.0 This appeal seeks the Inspectorate to consider the proposal for the siting and design of a proposed telecommunications installation. The proposal is for the installation of a telecommunications installation, Proposed 25m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works.
- 1.1 This is an NTQ (Notice to Quit) replacement site and not a new additional facility in the area. This appeal seeks the Inspector to gauge if the proposed telecommunications mast and associated cabinets would, by virtue of their size, siting and design, be harmful to the character and appearance of the area, and whether any visual harm caused by the proposal is outweighed by the requirement for the mast and the considerable benefits the development would maintain and deliver in terms of sustainability and provision of enhanced digital communication for residents and businesses in the cell search area.
- 1.2 The Appellant wishes to pursue the written representations appeal procedure.
1. In the reasons for refusal, as given by Perth and Kinross Council in their decision notice 25/00794/FLL on the 30<sup>th</sup> July 2025, they state that:
  - 1.1
  - 1.3

### ***Reasons for Refusal***

***1. The proposal, by virtue of its design, materials, scale and siting, would be detrimental to the landscaped garden area, which is an important element of the setting of the category A listed building. Approval would therefore be contrary to Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which requires planning authorities to have special regard to the desirability of preserving listed buildings and their settings; contrary to Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; and contrary to Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2.***

***2. The proposal, by virtue of its design, height, scale, siting and materials, would have a detrimental impact on the quality and character of the area, and it would not complement its surroundings. Approval would therefore be contrary to Policy 14: Design, Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2.***

***3. The proposal would have a detrimental and unacceptable impact on the setting of a category A listed building and on the quality and character of the area. As such, the proposal fails to minimise its impacts on visual amenity and the natural and built environment.***

***Approval would therefore be contrary to Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.***

- 1.4 The justification, reasoning, and decision for the refusal of the Planning Application, by Perth and Kinross Council are the subject of this appeal.
- 1.5 The Grounds for Appeal are:
  - The proposal is in accordance with the National Planning Policies (NPPF)

The proposal is in accordance with Policies of the Development Plan (**as well as Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997; Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2; Policy 24(e): Digital Infrastructure of National Planning Framework 4; and Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.**

- As with any application of this nature, all elements remain in line with the guidance outlined by the National Planning Framework 4. (NPF4)
- As outlined in this supporting statement, the applicant is confident that the telecommunications mast and ancillary infrastructure would not, by virtue of its size, siting and design be harmful to the setting of the listed building, or the character and appearance of the area and that robust evidence has been provided to demonstrate the continued need for this location.

### Key Issue/s

1.6 It is considered that the key issues for this appeal are:

- The proposed installation is to replace an existing installation and is not a new additional installation the existing site is located at Craigie Golf Course (NGR: E:310265, N: 722370). The site is being redeveloped to reconfigure the golf course and clubhouse, along with adding a community hub, sports courts, bike trails, walking and cycling paths, parking, up to 175 homes, open spaces, landscaping, drainage, and upgraded access. The Site Provider has issued an NTQ and now requires all equipment to be removed for redevelopment. The need for this new mast location stems from MBNL having been issued with an NTQ (Notice to Quit) on their existing site and thus this new mast is urgently required to maintain coverage.
- Whether the benefits of the appeal proposals outweigh the claim by the LPA that by reason of its height, siting and bulk would be harmful to the setting of the listed building and the character and appearance of the area, and whether any visual harm caused by the proposal is outweighed by the requirement for the mast.
- That there are no other suitable sites; by approving this site it will mean that the one installation will be able to provide a vastly improved level of service (access and speed) thus creating a very evident and demonstrable public benefit from the proposed enhancement of this cell's coverage.
- That the proposal meets the Operators coverage target.
- The Council has not carried out a full balancing exercise taking all material considerations into account including the significant social and economic benefits of the proposal, nor has it taken in to account the operators technical constraints, or the legal requirements to provide a high quality service and meet the customers' reasonable demands including access to the latest technology.
- Access to the latest superfast mobile technology in the form of 5G coverage is a strong material consideration in the determination of this proposed telecommunications installation.
- Through use of the EE network, the ESN (Emergency Services Network) provides resilient and secure mission-critical communications to Britain's emergency services.

## Technical Considerations

1.7 Consultation Responses (Sourced from the Delegated Report).

### 1.8 Historic Environment Scotland (HES)

HES have raised concerns about the proposal. The following comments are highlighted:

- Our view is the proposal would affect the setting of the Aviva building and we encourage your Council and the applicant to continue to explore alternative locations, if reasonably possible.
- The landscaped garden area to the north of the A-listed Aviva building forms an important element of its setting.
- The sensitive way the building is incorporated into its landscape setting is an important element of its special interest, contributing both to how the building is viewed externally and the high quality of its internal amenity.
- Our view is that it would be a relatively intrusive element within this landscaped area, in views both to and from the A-listed building. Our preference would be to see it located elsewhere.
- The applicant has explored a number of alternative options for siting the monopole. These have all been discounted, but it appears that other alternatives may be available.
- If your Council are satisfied that the Aviva grounds offer the most suitable option, we suggest that the pole is located downhill of the current site, to the north of the evergreen trees shown in the visualisations. This would allow the pole and associated equipment cabinets to be largely screened in views from the building.

### 1.9 Conservation Team

- The submitted supporting information states that “the office buildings provide a commercial backdrop for the installation, minimizing its visual impact from various viewpoints around the site,” which appears to acknowledge that the listed building will form a backdrop to the monopole. No assessment is apparent in relation to the potential adverse visual impact resulting from this. Given the height and siting, the proposed development will be clearly visible in the immediate and wider setting. This would present a significant intrusion, distracting from the listed building as the visual focus, and detracting from the quality of the landscaped grounds.
- While alternative sites have been investigated, there is no clear explanation as to why the proposed site is the most appropriate option, given the proximity of the listed building.
- The monopole is proposed to be mounted on a 5.8mx5.8m concrete base, with a depth of 1.4m. No information has been provided on the potential impact on adjacent trees or root protection areas, either in the course of development or thereafter.
- The proposal is contrary to NPF4 Policy 7 and LDP2 Policy 27A, in that it will affect the setting of a category A listed building, with no appropriate assessment made of the potential visual or physical impact, based on an understanding of the cultural significance of the building and its setting. I therefore object to the proposed development in its current form.

### 1.10 Perth Scone Airport

No response received.

## 1.11 REPRESENTATIONS

There was one objection to the application which was submitted on behalf of Aviva Central Services UK Ltd who is the landowner (NB: the applicant is EE (UK) Ltd & Hutchison 3G UK Ltd).

The following concerns were raised and are addressed in the appraisal section below:

- Contrary to NPF4 and LDP2 policies
- Impact on setting of listed building
- Due its distance from the existing mast and the difference in height, the proposed mast should not be described as a replacement mast
- Impacts on trees
- Impact on operation of wind turbine

### Additional Statements Received:

|   |                                      |
|---|--------------------------------------|
| Screening Opinion   | EIA Not Required                     |
| Environmental Impact Assessment (EIA): Environmental Report     | Not applicable                       |
| Appropriate Assessment under Habitats Regulations               | Habitats Regulations AA Not Required |
| Design Statement or Design and Access Statement                 | Not Required                         |
| Report on Impact or Potential Impact e.g. Flood Risk Assessment | Not Required                         |

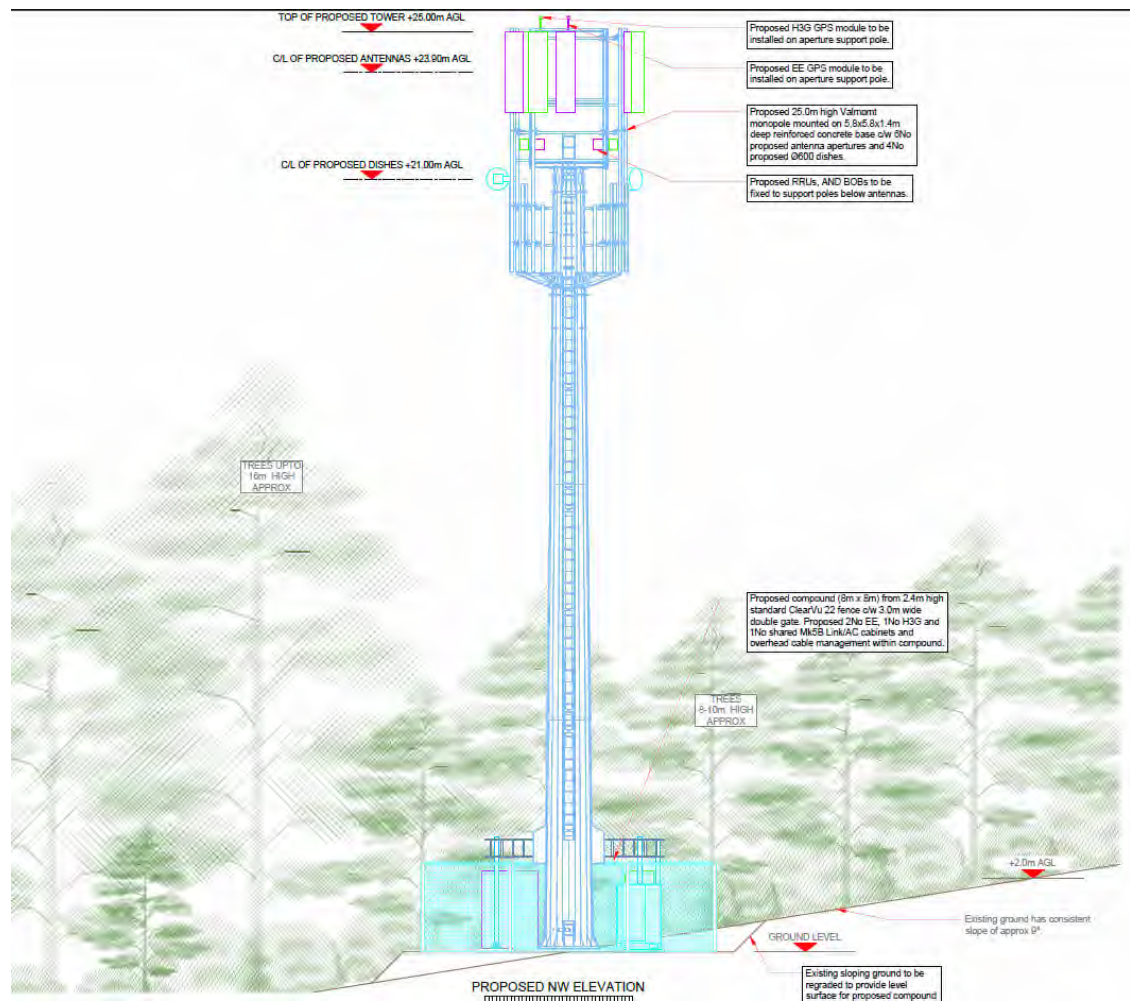
## 1.12 Appellant response

The appellant is somewhat at a loss to understand the reasoning behind Historic Environment Scotland's responses. The Aviva site has a 77m solid white wind turbine in close proximity to the listed building, circa 150m, see below. Which has a dramatic impact on the listed building





The proposed monopole mast is a similar distance from the listed building, but with established trees as a background, (up to 16m in height). The tower, antennas, RRUs, remote BOBs, GPS nodes and all the cabinets to be painted Fir Green (RAL6009), helping the proposed installation to assimilate with its surroundings





The Wind Turbine dwarfs the proposed monopole, the monopole when painted Fir Green it will help it to blend with the background trees.





- 1.13 The site has been identified as being necessary to provide network coverage. A further limiting factor is that the position must be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However, if this overlap is too great, unacceptable interference is created between the two cells.
- 1.14 Other sites have been looked at, but none were deemed suitable, see the discounted options below. It is important to note that due to the increased data transfer necessary for the latest telecommunication services, locations of base stations must be where the local demand exists. Siting and design concerns may centre particularly on the type of mast and its impact, particularly if located in a designated area. Its height, ancillary development and the scope for landscaping and screening will also be important considerations. But many antennas have special siting needs because they have a limited range or require line-of-site. Authorities should take full account of these needs.
- 1.15 The mast's height is determined by the need to reach sufficient coverage to address current and future service demands, with consideration given to technical requirements such as signal propagation and available space within the locality.
- 1.16 The appellant finds the Conservation Team assessment that with the height and siting, the proposed development will be clearly visible in the immediate and wider setting. This would present a significant intrusion, distracting from the listed building as the visual focus, and detracting from the quality of the landscaped grounds a bit tenuous given there is a 77m high Wind Turbine in plain view.
- 1.17 Their further claim that the proposed installation will affect the setting of a category A listed building, with no appropriate assessment made of the potential visual or physical impact, based on an understanding of the cultural significance of the building and its setting has no merit given the close location of the Wind Turbine to the listed building. The choice of location close to the tall established trees seeks to minimise any visual impact on the listed building and its grounds.
- 1.18 In response to the Aviva concerns:-
- The proposed mast will have no impact on the Wind Turbine operation
  - Impact on trees - The Appellant will be guided by NJUG Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees.
  - It is a replacement mast as EE Ltd & Hutchison 3G UK Ltd have been issued with a Notice to Quit at the current site.
- 1.19 When planning cellular telecommunications networks it is important for engineers to predict, with a high degree of confidence, the behaviour of cellular transmissions. This then enables the operator to calculate how many cell sites are needed to provide the level of coverage required by the services they offer under the terms of their licence. The strength of radio signals detected at a receiving device naturally reduces the further away it is from the transmitter. In general the reduction (or decay) in signal power is affected by a number of variables. The main factors are
- frequency,
  - distance (from transmitter),
  - terrain (such as hills),
  - clutter (such as buildings, foliage, vehicles, and water)
  - and atmospheric conditions (such as rain).

A reduction in the strength of the radio signal increases the likelihood of dropped calls and reduced data rates for internet browsing.

- 1.20 The primary justification for the proposed mast is a replacement installation and to address the increasing demand for mobile connectivity, both in terms of coverage and data capacity. The current infrastructure does not sufficiently meet the needs of existing users and the anticipated growth in mobile data consumption. This is particularly relevant in the context of the roll-out of 5G technology, which requires new infrastructure to support faster and more reliable mobile networks.
- 1.21 Telecommunication infrastructure plays a critical role in supporting economic growth, public safety, and social connectivity. It is essential that mobile network operators are able to deploy necessary infrastructure to meet these needs while complying with planning policies. The proposed mast at Pitheavlis will significantly improve the mobile network's performance in Perth, reducing connectivity issues such as call dropouts and slow data speeds, and providing future-proof infrastructure to support upcoming technological advances.
- 1.22 It is important to note that the appellant is limited in the available options for the installation, the proposed site has been identified as essential to maintain the network coverage for both EE and H3G and to avoid not-spots (loss of signal/coverage) when the existing mast site at Craigie Golf Club is decommissioned. It is important to recognise that these other Telecom providers rely on EE and H3G masts for their service, including Your Co-op, 1p Mobile, Utility Warehouse, Ecotalk, Lycamobile, Plusnet and BT Mobile, iD Mobile, Smarty, Honest Mobile and Superdrug.
- 1.23 It should also be recognised that through use of the EE network, the ESN (Emergency Services Network) provides resilient and secure mission-critical communications to Britain's emergency services.
- 1.24 It is extremely important to remember that due to the physics of radio frequency, each base station can only provide service to a limited geographic area and this is reduced further by topography and population density, amongst other things such as 'clutter' which is a technical term referring to near or distant line of sight obstruction or 'clutter' between the base station and the areas it is trying to provide service to. This 'clutter' can take the form of high trees or buildings in the wider area which obstruct the signal and severely disrupt the service or make a base station redundant entirely.
- 1.25 The fact is, these base stations are required **where the service is required**, where there is a population who demand service provision, placing an installation a distance away from a population means the installation cannot provide the service to where it is needed.
- 1.26 A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person is on the move, the network will transfer their calls from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage. This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal, or the latest technology is not available in that area yet, meaning that new technology designed to meet the high demands of the users including data cannot be fulfilled. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are. This appeal proposal is designed to avoid gaps in the 4G service provision and bring the latest 5G technology to this area. Ensuring this area of Perth benefits from the latest 5G coverage and capacity, enabling customers 5G enabled smart devices to work wherever they are located, in line with their expectations and for the purposes in which they bought them.

## 2.0 **Procedural Matters**

- 2.1 This appeal follows written pre-application consultation requests for feedback with the LPA, local ward councillors and key Stakeholders regarding the proposed installation of a 25.0m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works
- 2.2 No specific comments were received from the LPA or key stakeholders prior to the original submission.
- 2.3 A number of sites were investigated prior to this submission and the discounted options section highlights locations that were focussed upon.(See below in section 5.0)
- 2.4 As demonstrated within this document there are no Other Licensed Operators (OLOs) in the cell that can be shared and no viable roof tops where equipment can be housed.
- 2.5 This proposal is fully in accordance with the NPF4. As stated above, this is an existing NTQ (Notice to Quit) replacement site and not a new additional facility in the area.

## 3.0 **The Appeal Site / Context:**

- 3.1 It is imperative to consider that this proposal is to replace an existing installation and is not a new additional installation the existing site is located at Craigie Golf Club. The need for this Monopole stems from MBNL having been issued with an NTQ (Notice to Quit) on their existing site and thus this new mast is urgently required to maintain coverage.
- 3.2 The proposed site is at Pitheavlis, Necessity Brae, Perth, PH2 0PZ . The site is proposed to be positioned on the grassed area close to the established trees as illustrated in Figures 1a,1b,below.
- 3.3 The proposal is for the installation of a new 25m High monopole and associated antennas that will provide continued and improved coverage for EE, H3G LTE and ESN in this area of Perth, when the existing site is decommissioned. The proposed new facility will require the installation of a number of equipment cabinets, housing radio equipment at ground level and in close proximity to the base of the mast.
- 3.4 The location is strategically positioned to enhance mobile network coverage in the area, addressing signals and providing reliable connectivity for businesses, residents and visitors and will support local businesses by ensuring seamless communication. The demand for mobile data and connectivity is continuously increasing.
- 3.5 The proposed site provides a suitable location that seeks to minimize visual disruption and integrate with the environment. Stronger network coverage enhances the reliability of emergency calls and communication during critical situations, contributing to public safety. This area of Perth benefits from the current network coverage provided by the NTQ site, which if not replaced, will result in loss of that network coverage and potential dead spots.
- 3.6 In an area of such high demand with a constant influx of users provided with the constant increase in purchases of new and improved 5G capable phones and subsequent lack of supply the requirement for the proposed equipment cannot be disputed.

- 3.7 As previously stated, this is not a new additional installation but is a replacement for an existing installation that is to be removed. The proposed installation is necessary for the continued and improved wireless connectivity and capacity for local businesses, residents and visitors to this busy commercial area of Perth.

Figure 1a





Figure 1b



- 3.8 The Monopole is intended to maintain and improve mobile network coverage and capacity in the area, in line with national and local policy objectives aimed at enhancing digital connectivity. The proposal is made in accordance with the relevant planning policies and regulations, and the design of the mast has been carefully considered, endeavouring to minimize the visual impact and maintain the character of the surrounding area, whilst meeting the operational needs of the service providers.
- 3.9 The site is located on Pitheavlis, Necessity Brae, Perth, the is in between the Golf Course and the grounds of the Aviva Office, to the south is the M90 with fields beyond, to the north and east beyond the grounds and the golf course are residential properties, to the west beyond the office grounds are residential properties. The proposed site is relatively close to the existing NTQ site which will avoid any loss of coverage to the nearby houses and businesses.
- 3.10 Mobile telecommunications have become essential for modern life, supporting both personal communication and business activity. With the increasing reliance on mobile data and the growing demand for high-speed internet services, it is crucial to maintain and upgrade existing networks to ensure sufficient coverage and capacity. The installation of a mast at this location will maintain and provide enhanced coverage for

4G and future 5G networks, enabling local residents, businesses, and visitors to access reliable mobile services.

- 3.11 The area currently suffers from gaps in network coverage, and the proposed mast will significantly improve mobile connectivity. This will also contribute to the wider objectives of the UK Government's digital strategy, which seeks to improve mobile and broadband infrastructure across the country.
- 3.12 The proposed monopole mast is designed to help minimize its visual impact while ensuring adequate functionality. The mast will be approximately 25m meters in height, and it will be located in an area endeavouring to minimize its visual impact and reduce its prominence. In addition to the mast, there will be associated equipment cabinets, which will be located nearby, within the designated site area. These cabinets will be of a standard design and will be appropriately sized to house the necessary telecommunications equipment.
- 3.13 In accordance with the principles of National Planning Framework (NPF4) and the Code of Practice for Mobile Operators, a thorough search for alternative sites has been conducted. The proposed location on Pitheavlis, Necessity Brae, Perth PH2 0PZ was selected due to its suitability in terms of coverage, proximity to existing infrastructure, and minimal disruption to residential and commercial properties. Other potential sites in the surrounding area were either not feasible due to technical constraints, such as inadequate coverage or access, or were ruled out due to environmental or aesthetic concerns. This proposal complies with national and local planning policies concerning telecommunications development. The NPF4 supports the expansion of telecommunication networks, recognizing the importance of mobile infrastructure to the economy and social well-being. The proposal also aligns with Perth and Kinross Council's policies on promoting sustainable development and improving digital infrastructure.
- 3.14 The installation has been designed to meet the needs of the operators, whilst endeavouring to minimize the visual and environmental impact, appropriate measures will be taken to ensure the mast and equipment are maintained in good condition. The installation of a telecommunications mast on Cranmore Park is essential to maintaining and improving mobile network coverage in the area. The proposal has been designed to minimize its visual and environmental impact while meeting the need for enhanced mobile connectivity. The site has been carefully selected to ensure compliance with planning policies and to minimize disruption to the local community.
- 3.15 It is considered that facilitating the delivery of what is seen by the Labour Government as a key part of the economic growth strategy for the UK, would in this instance amount to special circumstances. Any refusal on the grounds that the development would not constitute special circumstance would delay and inhibit the delivery of this key driver of the wider UK economy. The investment in mobile infrastructure will continue and it will evolve. Just as the use of 4G mobile technology becomes widespread, the adoption and use of 5G mobile technology needs to be planned and implemented. Getting this right is important for three reasons:
1. Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026
  2. Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being.
  3. Mobile connectivity is essential to fulfilling the potential of new technologies.

- 3.16 It is extremely important to remember that due to the physics of radio frequency, each base station can only provide service to a limited geographic area and this is reduced further by topography and population density, amongst other things such as 'clutter' which is a technical term referring to near or distant line of sight obstruction or 'clutter' between the base station and the areas it is trying to provide service to. This 'clutter' can take the form of high trees or buildings in the wider area which obstruct the signal and severely disrupt the service or make a base station redundant entirely.
- 3.17 The fact is, these base stations are required **where the service is required**, where there is a population who demand service provision, placing an installation a distance away from a population means the installation cannot provide the service to where it is needed.
- 3.18 In accordance with the sequential approach outlined in the National Planning Framework (NPF4) the following search criteria have been utilised. Firstly, consideration is always given to the possibility of erecting antennas on an existing building, mast or other structure, or site sharing. The proposed 25m high monopole is from a site selection perspective the sequentially optimum solution. This proposed site is to replace an existing installation after being issued with a NTQ (Notice to Quit) and is not a new additional mast in the area.

The sequential approach is outlined below:

1. Installing a base station on an existing building or tall structure.
2. Upgrading an operator's own existing base station(s).
3. Using existing telecommunications structures belonging to another code system operator, i.e. mast sharing.

**If 1-3 unavailable, the only viable option is 4.**

4. Erection of a new ground-based mast
- 3.19 The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the NPPF. H3G and EE have a network sharing agreement and thus these installations are fully compliant with the NPPF. It is key to consider that the ESN (Emergency Services Network) also share on EE masts and thus this installation will also be F5G. The proposed installation will also allow for site sharing as outlined in Option 3 within the NPPF sequential approach.
- 3.20 In compliance with its licence and the sequential approach as outlined in the NPPF all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been successfully employed. As identified in the submitted documents that accompanied the planning application, no opportunities for site sharing are available, resulting in Option 5 of the sequential approach being the only viable route that would ensure delivery of the requisite digital service.
- 3.21 As with all 5G cells the search area is highly constrained covering a small radius with extremely limited availability of options and the only existing, viable solution from a planning and radio coverage perspective is the proposed installation.

#### **Future Telecoms Infrastructure Review**

- 3.22 In 2018, the Conservative Government published its Future Telecoms Infrastructure Review, which outlined plans to extend full-fibre broadband coverage across the country by 2033 and for the majority of the population to have access to 5G mobile coverage by 2027. The Previous Government's policies within this document are based on the fact that the existing telecoms infrastructure requires investment. Now that the UK has left the European Union, there was a significant focus from the Government on boosting the UK's productivity, and the New Labour Government has also signalled 'levelling up' digital connectivity as pivotal to their plans. The approval of



this Appeal, and other similar applications, will assist the New Government in achieving their aspirations regarding the 5G network.

### Public Benefits

- 3.23 As well as the Appeal proposals being in line with Government aspirations, there are also clear and demonstrable public benefits arising from maintaining the provision of the 5G network in the existing location. Figure 3 below (extrapolated from the Government Published 'Future Telecoms Infrastructure Review') summaries the economic and social benefits that 5G coverage can generate, at both a macro and micro scale.

Figure 3.





#### 4.0 **Consideration / Justification:**

##### **Policy / Guidance Consideration:**

#### 4.1 **Local Plan Policy:**

4.2 In the reasons for refusal, as given by Perth and Kinross Council in their decision notice 25/00794/FLL on the 30<sup>th</sup> July 2025, they state that:

##### **Reasons for Refusal**

1. The proposal, by virtue of its design, materials, scale and siting, would be detrimental to the landscaped garden area, which is an important element of the setting of the category A listed building. Approval would therefore be contrary to Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which requires planning authorities to have special regard to the desirability of preserving listed buildings and their settings; contrary to Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; and contrary to Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2.
2. The proposal, by virtue of its design, height, scale, siting and materials, would have a detrimental impact on the quality and character of the area, and it would not complement its surroundings. Approval would therefore be contrary to Policy 14: Design, Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2.
3. The proposal would have a detrimental and unacceptable impact on the setting of a category A listed building and on the quality and character of the area. As such, the proposal fails to minimise its impacts on visual amenity and the natural and built environment.

Approval would therefore be contrary to Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.

#### 4.3 **1. Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997**

*General duty as respects listed buildings in exercise of planning functions.*

*(1) In considering whether to grant planning permission for development which affects a listed building or its setting, a planning authority or the Secretary of State, as the case may be, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

*(2) Without prejudice to section 64, in the exercise of the powers of disposal and development conferred by the provisions of sections 191 and 193 of the principal Act, a planning authority shall have regard to the desirability of preserving features of special architectural or historic interest and, in particular, listed buildings.*

*(3) In this section, "preserving", in relation to a building, means preserving it either in its existing state or subject only to such alterations or extensions as can be carried out without serious detriment to its character, and "development" includes redevelopment.*

#### 4.4 Appellant response

- 1) The choice of location for the proposed monopole close to the treeline some distance from the listed building, seeks to minimise any visual impact on the building and grounds. The appellant believes that the existing Wind Turbine has a far greater visual impact on the listed building and surrounds.
- 2) The proposed location will not affect the integrity or structure of the listed building; it will be preserved.
- 3) The appellant doesn't believe that this applies to this application

#### 4.5 Historic assets and places

#### 4.6 Policy 7 c)

**Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.**

Appellant response

By proposing the site alongside the existing mature trees the appellant is endeavouring to minimise any impact on the setting and character of the listed building. The proposed installation will all be painted Fir Green to help it to assimilate with its surroundings.

#### 4.7 Policy 27A: Listed Buildings

**There is a presumption in favour of the retention and sympathetic restoration, correct maintenance and sensitive management of listed buildings to enable them to remain in active use, and any proposed alterations or adaptations to help sustain or enhance a building's beneficial use should not adversely affect its special architectural or historic interest.**

**Encouragement will be given to proposals to improve the energy efficiency of listed buildings within Perth and Kinross, providing such improvements do not have a significant detrimental impact on the special architectural or historic interest of the building.**

**Enabling development may be acceptable where it can be shown to be the only means of preventing the loss of listed buildings and securing their long-term future. Any development should be the minimum necessary to achieve these aims. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the building's character, appearance and setting.**

Appellant response

- a) The appellant doesn't believe that this applies to this application
- b) This seems contradictory given that a 77m high Wind Turbine was approved on this site to improve energy efficiency
- c) As before the proposed siting and colour of the monopole seeks to minimise any impact on the setting of the listed building.

4.8 2. Policy 14

**a) Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.**

**b) Development proposals will be supported where they are consistent with the six qualities of successful places:**

- **Healthy:** Supporting the prioritisation of women's safety and improving physical and mental health.
- **Pleasant:** Supporting attractive natural and built spaces.
- **Connected:** Supporting well connected networks that make moving around easy and reduce car dependency
- **Distinctive:** Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.
- **Sustainable:** Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.
- **Adaptable:** Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.

**c) Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.**

Appellant response

a)

"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..."

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.

b)

i. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being. The improvement to the Telecommunications Network will improve the ability to use their smart phones and watches to monitor and record exercise workouts as part of a healthy lifestyle.

The installation of the proposed equipment will enhance network speeds, thus allowing easier access to features such as CCTV, communication and emergency services. This, in turn, will create a society which is more closely connected and supported, thus creating safe and secure environments in which the scope for crime and fear of crime is designed out.

ii. The proposed monopole location seeks to minimise its impact on the natural and built spaces.

- iii. Mobile connectivity is essential to fulfilling the potential of new technologies.
  - iv. Telephone masts are distinctive, the proposal to paint the whole structure Fir Green supports the attention to detail required to help the installation assimilate with the natural landscape, helping to creatively adapt designs to reinforce identity.
  - v. The installation seeks to encourage and explore opportunities to create new public realm by improving network coverage and access, allowing residents access to fitness apps on their smart phones and tablets (improving health), to be able to work from home, (helping to reduce traffic levels), to be able to communicate more quickly with the improved network access and speed.
  - vi. The proposed installation will allow multiple service providers
- c) The proposed installation is adaptable it is important to recognise that the appellant is limited in the available options for the installation, the proposed site has been identified as essential to maintain the network coverage for both EE and H3G and to avoid not-spots (loss of signal/coverage) when the existing mast site at Craigie Golf Club is decommissioned. It is also important to recognise that these other Telecom providers rely on EE and H3G masts for their service, including Your Co-op, 1p Mobile, Utility Warehouse, Ecotalk, Lycamobile, Plusnet and BT Mobile, iD Mobile, Smarty, Honest Mobile and Superdrug. It should also be recognised that through use of the EE network, the ESN (Emergency Services Network) provides resilient and secure mission-critical communications to Britain's emergency services.

#### 4.9 **Policy 1: Placemaking Policy**

**1A Development must contribute positively to the quality of the surrounding built and natural environment. All development should be planned and designed with reference to climate change, mitigation and adaptation. The design, density and siting of development should respect the character and amenity of the place, and should create and improve links within and, where practical, beyond the site. Proposals should also incorporate new landscape and planting works appropriate to the local context and the scale and nature of the development.**

Appellant response

1A The proposed installation can help climate change, mitigation and adaptation. The design, density and siting of development seeks to respect the character and amenity of the place, and create improve links within and beyond the site.

#### 4.10 **Policy 1B All proposals should meet all the following placemaking criteria:**

- (a) Create a sense of identity by developing a coherent structure of streets, spaces, and buildings, safely accessible from its surroundings.**
- (b) Consider and respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area.**
- (c) The design and density should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours.**
- (d) Respect an existing building line where appropriate, or establish one where none exists. Access, uses, and orientation of principal elevations should reinforce the street or open space.**

**(e) All buildings, streets, and spaces (including green spaces) should create safe, accessible, inclusive places for people, which are easily navigable, particularly on foot, bicycle and public transport.**

**(f) Buildings and spaces should be designed with future adaptability, climate change and resource efficiency in mind wherever possible.**

**(g) Existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals**

**(h) Incorporate green infrastructure into new developments to promote active travel and make connections where possible to blue and green networks.**

**(i) Provision of satisfactory arrangements for the storage and collection of refuse and recyclable materials (with consideration of communal facilities for major developments).**

**(j) Sustainable design and construction.**

Appellant response

a) The appellant doesn't believe that this applies to this application

b) The proposed site location next to the treeline seeks to respect site topography and any surrounding important landmarks, views or skylines, as well as the wider landscape character of the area.

c) The Monopole is built of high quality, durable, robust, low maintenance materials; and is designed to be as unobtrusive as possible, the height at 25m is the very lowest that works effectively for the Operators, painting the installation Fir Green will help it assimilate with its surroundings.

d) The appellant doesn't believe that this applies to this application

e) The appellant doesn't believe that this applies to this application

f) The appellant doesn't believe that this applies to this application

g) The appellant doesn't believe that this applies to this application

h) The appellant doesn't believe that this applies to this application

i) The appellant doesn't believe that this applies to this application

j) The design and build of the proposed 25m Monopole is robust, it is used all over the country in many different locations and is subjected to all weather conditions without detriment.

4.11

3.

***The proposal would have a detrimental and unacceptable impact on the setting of a category A listed building and on the quality and character of the area. As such, the proposal fails to minimise its impacts on visual amenity and the natural and built environment.***

Appellant response

This appears to be disingenuous on the part of the LPA given that there is a 77m high Wind Turbine on the site, that towers above the listed building and grounds. The Wind Turbine is highly visible from many locations surrounding the site.

#### 4.12 Policy 24

**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.**

Appellant response

i) To clarify, the Local Planning Authority is required to undertake a balancing exercise. The balance is the visual impact (and perceived harm to amenity) weighed against the need, technical requirements of the installation and availability of a suitable and available site. This balance is a well-known and most important matter for the determination of telecommunications applications and appeals. Had the Case Officer weighed perceived levels of harm to amenity against public benefit, as required by NPF, they would ordinarily have concluded the balance was overwhelmingly in favour of support for such development.

ii) Please see discounted options below

iii) The appellant doesn't believe that this applies to this application

#### 4.13 Policy 59: Digital Infrastructure

**The Council will support development that provides digital and mobile communications infrastructure to homes and businesses and improves quality of life for residents and workers provided the environmental impacts on the natural and built environment are minimised. The Plan is particularly supportive of the expansion of broadband and mobile communications services in rural areas.**

**The Digital Economy Act 2017 enables everyone in the UK to request a broadband download speed of at least 10Mbps by 2020 under a Universal Service Obligation. This will mainly affect rural areas but also some urban areas.**

**Developers should therefore make provision for digital infrastructure in all new-built development in urban and rural areas as an integral part of the development.**

**Equipment should be designed and positioned as sensitively as possible although some technical requirements may limit this. The visual impact of communications infrastructure will play a significant part in the determination of planning applications.**

**The siting and design of communication infrastructure should consider all the following series of options when selecting sites:**

- (a) installation of smallest suitable equipment;**
- (b) concealing/disguising masts, antennas, equipment houses;**



- (c) site/mast sharing;**
- (d) installation on existing building and structures; and**
- (e) installation of ground-based masts.**

Appellant response

- a) The type of installation that the applicant has proposed is the optimum design solution for deploying 5G technologies and the height at 25m is the very lowest that works effectively for the Operators. Given the siting preference, the proposed location is deemed acceptable and appropriate. If the height of the monopole were to be reduced below 25m then the installation would not be able to provide adequate coverage for the Operators
- b) The proposed installation will be located beside the established trees and painted Fir Green, helping the monopole to blend with the background trees.
- c) There are no suitable masts for mast sharing
- d) There are no suitable buildings or structures to utilise
- e) The proposal is for a ground based mast, the only viable option

**4.14 Planning applications for communications infrastructure should address the following matters:**

- (a) an explanation of how the proposed equipment fits into the wider network;**
- (b) a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;**
- (c) details of the design, including height, materials and all components of the proposal;**
- (d) details of any proposed landscaping and screen planting, where appropriate;**
- (e) an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;**
- (f) a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP (International Commission on Non-Ionizing Radiation Protection) guidelines that give recommendations for limiting exposure to and absorption of the high-frequency energy fields emitted by mobile phone communication base stations;**
- (g) an assessment of visual impact, if relevant; and**
- (h) ancillary associated works associated with the development, including but not limited to access tracks and security fencing.**

Appellant response

- a) A limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.
- b) Please refer to Discounted Options
- c) Detailed drawings were submitted with the application
- d) None at present
- e) This is an NTQ replacement site not an additional installation in the area.
- f) An ICNIRP certificate was submitted with the application

g) Photomontages/ Visualisations were submitted with the application

h) Please refer to drawings

- 4.15 The Labour Government is keen to maintain and improve telecommunications capacity. They see it as way of stimulating the economy and growth, 5G will be the cornerstone of our digital economy. With higher capacity and lower latency, standalone 5G will drive growth in the industries of today and tomorrow including in emerging sectors like artificial intelligence where Britain leads the world. Just take smart ports, where 5G-enabled remote operation can help us to move containers more quickly, efficiently, and safely, boosting our international competitiveness. 5G can improve our public services, too, in everything from education to social care. In transport, for example, we can use 5G to power forward progress in everything from real time travel information to augmented reality navigation and self-driving buses and taxis.”
- 4.16 Which is why the time is right to turn our sights to mobile connectivity, where the same sense of mission is needed to deliver the kind of wireless infrastructure that will transform how we live our lives and run our economy. This is not simply a matter of improving download speeds as people browse the internet on their phones or dial into work calls. It is far more transformative than that.
- 4.17 The power of 5G and future telecoms advances will unlock new solutions in everything from industry to healthcare. Falling behind in coverage will mean falling behind in international competitiveness when it comes to the technologies of tomorrow, and failing to provide British people with innovative, life-enhancing services on secure, resilient networks.”
- 4.18 Whilst 4G may have accounted for 66.6% of total mobile subscriptions in 2019; its share will decline over the forecast period to reach 50.9% by 2024 due to customer migration to 5G. GlobalData expects 5G subscriptions to account for 39.9% of all mobile subscriptions by 2024. [Source – Global Data, 2020]
- 4.19 The Government wants 5G to be provided now because stalling on 5G provision can have significant detrimental effects on the UK economy. The Centre for Social Policy in its published report ‘*Upwardly Mobile: How the UK can gain the full benefits of the 5G revolution*’ estimate the cost as much as £41 billion.
- 4.20 **Minister for Data Protection and Telecoms, Sir Chris Bryant has highlighted the importance of digital infrastructure claiming it is “as essential as water and electricity”.**

Speaking at the *2024 Connected Britain* conference in London last week (11-12 September), Bryant said digital infrastructure underpins the modern digital economy and “is a key driver of productivity, growth and is as essential as water and electricity.”

He said: “I won’t bore you with the statistics that you already know but suffice it to say that we have made significant progress on superfast broadband, on gigabit-capable broadband, on [4G](#) and [5G non-standalone](#).”

This comes as Bryant revealed the UK’s digital inclusion strategy is now more than 10 years old - and 10 years out of date. “That cannot be right,” he asserted.

“Tackling digital inclusion is a key priority for this government. We want to take everyone with us - because if people are excluded by geography, age, financial status or lack of skills, that is a problem for the whole of society - and for you.”

He concluded: “I’m certain we can do better - but we need to work together, government and industry, to realise the full potential of every community.”



- 4.21 In keeping with the National Planning Framework (NPF4) guidelines of using high quality communications infrastructure the 25m Valmont Monopole has been selected to try to minimise its visual impact upon the immediate and wider locale, whilst meeting the operational requirements of the Operators. The site location has been identified as essential to maintain the network coverage, to avoid the risk of “deadspots”.
- 4.22 The site has been selected to provide the required essential new 5G coverage whilst endeavouring to respect and to protect the amenity of the residents further afield. Resultingly, any perceived harm will be considerably outweighed by the tangible public benefits the scheme will deliver. The proposed installation is required to maintain and deliver new 5G coverage within the PH2 area of Perth and, given the build and technical coverage constraints, the least visually intrusive design solution available has been proposed.
- 4.23 The position of the site and ancillary infrastructure, as detailed in the submitted Planning Application, is to maintain the current provision of enhanced digital connectivity and rollout of the ‘Next Generation’ of telecommunication services and mobile broadband.
- 4.24 The 5G installation is required to ensure mast sharing can be facilitated (as prescribed by policy and guidance) and temporarily remove the need for any additional telecommunications masts in this location.
- 4.25 The opinion of Perth and Kinross Council that the development would be contrary to the objectives of the LDP as detailed above is challenged.
- 4.26 Contrary to the opinion of Perth and Kinross Council, it is considered that the current development would accord with all elements of the LDP (**Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4, Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2, Policy 14: Design, Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2, Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2**), notably in the fact that the design and siting of the installation is one that is not too alien in the existing context.
- 4.27 The mast will appear as a telecommunications installation, in a location where seeing such development would not appear too unusual. It is of an appropriate design to ensure service delivery, yet is static and a vertical structure that does not visually jar or harm amenity. All efforts to keep the mast out of and away from potentially sensitive receptors have been adhered to.
- 4.28 For the proposal to be ‘detrimental’ to amenities of the area and for the scheme to constitute ‘harm’ (overbearing) regarding the character of the area, it would need to be ‘unpleasant’ or ‘harmful’ to the wider environment. In this instance it is noted that the site is well located on the grassed area beside the treeline at Pitheavlis, Necessity Brae.
- 4.29 For clarity, the development seeks to minimise the mass and scale of the installation whilst delivering the service and operational requirements associated with providing new essential 5G coverage and future proofing the installation for deployment of other technologies. In addition, the cell area is one of high-density commercial, residential and visitor mobile users. This means that the one installation will be able to maintain and provide a vastly improved level of service (access and speed) to a multitude of users, which by default emphasises a very evident and demonstrable public benefit. It is accepted that any development constitutes a change, but in this instance the change would not be too unpleasant or harmful, and is suitably distant, and visually separated

from sensitive receptors. It would be less than half the height of the existing Wind Turbine. It would be similar to numerous similar structures near this location (electricity pylons and poles) of which designs and installations are accepted and regularly seen in comparable locations across the UK.

- 4.30 As stated throughout this appeal statement all efforts have been made to pull the installation as far away from residential properties, businesses and sensitive constrained areas as possible whilst still allowing them all the expected levels of digital coverage for day-to-day life and business. The fact that the scheme seeks to provide a suitable design is not considered to be so damaging or sufficiently obtrusive as to justify the stance taken by Perth and Kinross Council in this instance.
- 4.31 The applicant is confident that with the proposed design the character of the area is maintained. As stated above there is no scope to locate the proposed installation to an alternative site, given the extremely limited constraints within which the appellant strives to achieve and maintain improved digital delivery.
- 4.32 In light of the above reasoning, it is suggested that the development does accord with the requirements of Policy and other policies of the Development Plan as it would not result in harm (perceived or otherwise) to the character of the area or amenity of users. It is imperative to emphasise the benefits of this installation as it would provide and maintain an enhanced level of electronic communication service for transient users, businesses and residents alike. The supporting statement gives further details on the benefits of the proposal.
- 4.33 It is important to recognise that the need for this new installation is from MBNL having been issued with an NTQ (Notice to Quit). The provision of this infrastructure, in an area identified as one potentially lacking in connectivity, would accord with the objectives above. As identified this area will suffer from poor access to digital services to the detriment of local residents and businesses if the proposed installation is dismissed.
- 4.34 As previously stated, from a planning perspective the sequential approach should be followed for all telecoms sites regardless of their location and this has been rigidly adhered to with this proposal. Operators are committed to provide coverage and improve capacity. Operator's need for a new base station derives from a sequential approach to a site selection process.

This sequential approach is outlined below:

1. Installing a base station on an existing building or tall structure.
2. Upgrading an operator's own existing base station(s).
3. Using existing telecommunications structures belonging to another code system operator, i.e. mast sharing.

**If 1-3 unavailable, the only viable option is 4.**

4. Erection of a new ground-based mast.
- 4.35 In this instance the possibility of fulfilling the requirement by upgrading an existing site, mast sharing or using an existing building or tall structure is not available, hence the proposed installation. However it still accords with the sequential approach (as demonstrated within the supporting statement the cell search area is extremely contained and the only viable option has been put forward). Furthermore, the LPA had an opportunity to offer alternatives at the point of pre-application consultation but chose not to take up this chance to guide development in a way they saw as appropriate.
- 4.36 As previously stated, in compliance with its licence and the sequential approach outlined in the NPF4 all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. As

stated above this is an 5G monopoly and thus is the very optimum solution from a sequential site selection perspective.

- 4.37 The proposed facility will provide 4G and essential 5G coverage all from the same installation. The Appellant has followed the National Planning Framework when identifying this site. The Site has been identified as the least obtrusive option that will allow the improved coverage provided by the mast. The Site has been identified as the least obtrusive option that will allow the improved 5G coverage.

## 5.0 **Public Benefits**

### 5.1 **FORGING OUR DIGITAL FUTURE WITH 5G: A STRATEGY FOR SCOTLAND**

#### 5.2 **Foreword by Paul Wheelhouse MSP Minister for Energy, Connectivity and the Islands**

- 5.3 *"The technological revolution will be a significant opportunity for Scotland over the coming years. The rollout of 5G is the next wave and will potentially see huge social, economic and environmental benefits to the whole country."*
- 5.4 *"While the UK's mobile network operators are already investing large sums in rolling out 5G, we must act collectively to ensure that all of Scotland – including rural areas – benefits from this revolution. The prize is a boost to our nation's fortunes, creating better, healthier and happier lives for everyone."*
- 5.5 *"The Scottish Government's aspiration is for Scotland to be at the forefront of this revolution and, ultimately, to establish the whole country as a leading 5G digital nation."*
- 5.6 *"5G is so much more than an upgrade of previous generations of mobile connectivity. It will enable new or enhanced connectivity in the fields of transport, artificial intelligence (AI), robotics and remote monitoring – the opportunities are endless. This enhanced connectivity will make us more productive and efficient as a country and play a vital role in the transition to a zero-carbon economy and tackling the climate emergency, e.g. through reduced emissions."*
- 5.7 *"5G will be transformational for businesses, public services and for individual citizens. It is suggested that enhanced 5G capability could reduce business start-up costs, stimulate exports and increase the use of cost-reducing technologies such as cloud computing. It could provide easier access to healthcare, education and online shopping for people, wherever they live in the country."*
- 5.8 *"It is estimated that by enhancing 5G capability, Scotland has the potential to add £17 billion to GDP by 2035, create 160,000 new jobs and increase productivity by £1,600 per worker. 5G could play a part in creating 3,100 new businesses and a £3.3 billion growth in export volumes."*
- 5.9 *"Significantly, 5G also has the potential to help sustain remote and rural areas, allowing all of Scotland's citizens and communities to embrace the technology and reap its benefits. To make this happen, the Scottish Government is working with a range of organisations and interested parties to ensure the swift national deployment of 5G."*
- 5.10 *"However, telecommunications in the UK is reserved to the UK Government and mobile network rollout is commercially led. We continue to press the UK Government to give us the powers and resources which would allow us to reap the significant benefits that we could see from enhanced 5G provision in Scotland. We cannot wait*

*any longer, which is why we are driving ahead and setting out what action we, with the powers and resources we do have, can take to enhance digital connectivity. The Scottish Government is determined that Scotland will not be left behind. Indeed, we will continue to work with industry, the regulator and others in the public sector to make sure we are at the forefront of this revolution.”*

- 5.11 *“In this strategy we set out our commitment and steps to embracing the possibilities of 5G and ensuring that Scotland is able to seize the prize and become a 5G leader and a forward-looking digital nation.”*
- 5.12 5G is a step up in the quality, capacity and flexibility of mobile wireless communications. 5G has the potential to offer greater reliability, much faster download and upload speeds, greater capacity to ease congestion and accommodate more connected devices or sensors. It also brings lower latency allowing near instant response with no time lag. All of this can enhance people’s experience of technology and enable new ways of doing things.
- 5.13 But 5G is much more than just an enhanced version of the present 4G mobile broadband services. 5G will be central to the seamless delivery of high quality and reliable wireless connectivity in any urban or rural environment, in transit and on any mode of transport, including trains and planes.
- 5.14 Furthermore, 5G will have the ability to integrate with other wireless technologies, such as 4G, Wi-Fi and Internet of Things (IoT) technologies.
- 5.15 5G will enable data to be moved rapidly and enable more devices to be connected simultaneously. Together these technologies allow new use cases to be built on top of wireless connectivity and real-time data, from video analysis, to automated vehicles, robotic factories and drones. For the individual, 5G opens up immersive audio-visual applications which bring to life a raft of new professional and leisure activities. Creative industries, including software, computer games, design, and animation, is one of the fastest growing sectors in Scotland. Here innovative businesses rely on seamless interaction between different technologies and instant communication across the globe. The value lies in an ability to connect and create new products and services using immersive technologies and data analytics.
- 5.16 The capabilities of 5G could be applied in sectors where Scotland already has a leading edge, such as healthcare, transport, education, public service delivery, energy, agriculture and aquaculture. These potential use cases could transform the way services are delivered by driving national productivity, delivering efficiencies and improving the consistency and reliability of the user experience.
- 5.17 Achieving widespread 5G deployment will involve the coordination of industry and the public sector – and a clear understanding by all parties of how policy can drive change. This also extends to understanding how targeted public-sector support can potentially drive different and wider benefits. While industry is expected to lead the transition to 5G this is still being played out. The rollout of 5G networks is currently in its infancy and the public sector needs to engage with the private sector to not only deploy 5G infrastructure but deliver transformative benefit using the technology.
- 5.18 The Scottish Futures Trust, on behalf of the Scottish Government, commissioned Deloitte to undertake an assessment of the potential economic impact of enhanced digital capability in Scotland relating to wireless and mobile technologies such as 4G and 5G.



- 5.19 Scotland could add £17 billion to GDP by 2035 which would represent a return to Scotland's historical long-run trend growth rate of 2%, from the GDP growth rate of 1.5% otherwise assumed in the base case.
- 5.20 **DEREK MACKAY CABINET SECRETARY FINANCE AND THE CONSTITUTION:**
- 5.21 **REALISING SCOTLAND'S FULL POTENTIAL IN A DIGITAL WORLD: A DIGITAL STRATEGY FOR SCOTLAND**
- MINISTERIAL FOREWORD**
- 5.22 *"As Cabinet Secretary with overall responsibility for our Digital Strategy, I am determined to ensure that Scotland continues to prosper in an increasingly connected and competitive world. This demands that we look outwards, learn from international experience and assess our progress against that made by other progressive countries. It requires us to work with experts to monitor the development and implications of new and emergent technologies such as the internet of things, cloud computing, sensors, artificial intelligence and machine learning. It also demands that we challenge old ways of thinking about the services we offer and the organisations that deliver them."*
- 5.23 *"Back in 2011, the Scottish Government published a Digital Strategy designed to extend connectivity, promote the digital economy, digitise public services and promote digital participation. Good progress has been made in delivering this agenda and we are now in a position to develop and describe future actions and priorities that build upon a platform of success."*
- 5.24 *"Realising Scotland's full potential in a Digital World sets out our plans for ensuring that we put digital at the heart of everything we do – in the way in which we deliver inclusive economic growth, reform our public services and prepare our children for the workplace of the future. It's a strategy for Scotland, not just the Scottish Government. It recognises the profound challenges that digital poses for the nature of work, for society and for both the world and domestic economies. It also accepts that no single organisation can hope to have the answers to these questions and therefore looks to create a culture and environment of partnership in which we take collective action to ensure that nobody is left behind and we all remain safe, secure and confident about the future."*
- 5.25 *"I have been really encouraged by the creative and innovative ideas that people across Scotland, and indeed beyond, contributed to the development of this plan. It suggests to me that there is great confidence in Scotland's future in a digital world and a collective determination to ensure that we reap the benefits of the digital age. I hope that this document provides a vision around which we can build the collective action that this demands."*
- 5.26 *Technology transforms the way in which we live our lives. It connects us in new and different ways. It puts more power into the hands of the users of services and offers new insights and opportunities for those who provide them. It creates a platform and a momentum for innovation and has the potential to fundamentally redefine the relationship between the public sector and the people it serves.*
- 5.27 *Much of this is exciting and positive for our country. The opportunity to develop new products and services; to create and collaborate across cultures and borders and develop successful, global businesses at a scale and a speed that was previously unimaginable. The chance to reduce the costs and increase the quality of public services, change the way in which we learn, work and live and access information and knowledge from around the world.*
- 5.28 *However, we also recognise that with these opportunities come some risks. Digital disrupts traditional jobs and industries, puts new pressures on our right to privacy and*

*has the potential to create new forms of social exclusion. It generates new opportunities for criminal exploitation and raises serious questions and challenges for national and international security. The Scottish Government will ensure that Scotland is recognised throughout the world as a vibrant, inclusive, open and outward-looking digital nation.*

5.29 In addition to the Appeal proposal's alignment with Government's aspirations, there are also clear and demonstrable public benefits arising from the provision of a reliable digital communication network via the introduction of essential new 5G coverage for the operator along with improved coverage and capacity for other technologies.

5.30 OUR VISION IS OF A COUNTRY WHICH:

- Stimulates innovation, welcomes investment and promotes its digital technologies industries
- Develops internationally competitive, digitally mature businesses across all sectors
- Designs and delivers digital public services around the needs of their users Shares and opens up nonpersonal data as a source of innovation and efficiency
- Has a public sector that operates on contemporary, digital, platform-based business models
- Is led by a Government that "gets digital" and supports its staff to operate in digital ways
- Provides high quality connectivity across the whole of our country is recognised internationally as a natural test bed for innovation in connectivity
- Focuses its education and training systems on expanding its pool of digital skills and capabilities
- Tackles the current gender gap in digital skills and careers
- Enables everybody to share in the social, economic and democratic opportunities of digital
- Creates the conditions which safeguard workers and enables Scottish society to address concerns about the digital world
- Is secure and resilient to cyber threat and risk. In a world which is changing so rapidly, a digital strategy developed at a fixed point in time cannot hope to provide all the answers. What it does do however, is describe the initial steps we will take in what will be a long and unpredictable journey and, in particular, describe how we will ensure that Scotland is able to anticipate and react, in an agile way, to the ever-changing opportunities of the digital age.

5.31 The proposed installation will be a key element in helping the Scottish Government to achieve these aims.

5.32 It is considered that the proposed installation would facilitate the delivery of what is seen by Government as a key part of the economic growth strategy for the UK and any refusal would delay and inhibit the delivery of this key driver of the wider UK economy. The investment in mobile infrastructure will continue and it will evolve. The 'Councils & Connectivity – How local government can help to build mobile Britain' publication issued by Mobile UK (September 2018) emphasised the importance of reliable digital communication networks for the local and wider UK economy stating:

5.33 *Just as the use of 4G mobile technology becomes widespread, the adoption and use of 5G mobile technology needs to be planned and implemented. Getting this right is important for three reasons:*

1. *Mobile connectivity is essential to the future success of the economy. The combined value of 4G and 5G mobile connectivity is estimated to add £18.5bn to the economy by 2026*

2. *Mobile connectivity is essential to creating a better society. Digital inclusion can help people gain employment, become more financially secure and improve health and well-being.*
3. *Mobile connectivity is essential to fulfilling the potential of new technologies. Innovations such as Artificial Intelligence and connected cars will change how we work, spend our leisure time and run our public services. The mobile industry has been able to enhance mobile connectivity across most of the country. But there is more to be done.*

- 5.34 As stated above, the proposed telecommunication equipment is designed to facilitate essential new and improved coverage and capacity for the operator. The proposal is essential for the Operator to bring optimum telecommunications and mobile broadband services to the Simshill area and this site is critical in terms of ensuring that essential connectivity can be maintained in line with government targets.
- 5.35 Without the proposed installation in place the operator will not be able to provide essential capacity and coverage, seriously hindering any use of the associated critical connectivity services.
- 5.36 Given the changes in working patterns brought about in response to the Covid19 pandemic, with a significant increase in the percentage of the country's workforce now working from home, the existing networks have been dealing with higher levels of demand than ever seen before. The proposed installation will therefore ensure the improved provision of the 4G along with new 5G coverage and capacity, providing connectivity and network coverage for the operator at a time of unprecedented high demand.

## 6.0 **Policy / Guidance Consideration:**

### 6.1 **Local and National Planning Policy:**

- 6.2 The Scottish Government remain committed to promoting telecommunications and place emphasis on the importance of telecommunications to the wider economy. The Scottish Planning Policy sets out the Government's planning policies for Scotland and how these are expected to be applied at the Local level. It provides a framework within which local people and their representative Councils can shape distinctive local and neighbourhood plans, which reflect the needs and priorities of their own communities.

- 6.3 The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions of sustainable development, each of which give rise to the need for the planning systems to perform a number of roles including: -

- Economic Role - contributing to building strong, responsive and competitive economy.
- Social Role - Supporting strong vibrant and healthy communities; and
- Environmental Role - Contributing to protecting and enhancing our natural, built and historic environment.

- 6.4 The Scottish Planning Policy 'SPP' and National Planning Framework 'NPF4' contain at their core, a presumption in favour of sustainable development which runs through both plan making and decision-making processes. In addition, both the SPP and NPF4 recognise the vital importance of high-quality telecommunications and outline the Government's support for high quality communications. The paragraph extracts (highlighted below), clearly outline the overarching support from the Government for telecommunications and how Local Planning Authorities should embrace this vital infrastructure:

- 6.5 *“Outcome 1: A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places.”*
- 6.6 *“14. NPF4 aims to strengthen the role of our city regions and towns, create more vibrant rural places, and realise the opportunities for sustainable growth and innovation in our coastal and island areas.”*
- 6.7 *“15. The SPP sets out how this should be delivered on the ground. By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. Well-planned places promote well-being, a sense of identity and pride, and greater opportunities for social interaction. Planning therefore has an important role in promoting strong, resilient and inclusive communities. Delivering high-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live and style of home, choice as to how to access amenities and services and choice to live more active, engaged, independent and healthy lifestyles.”*
- 6.8 *“This SPP introduces a presumption in favour of development that contributes to sustainable development.”*
- 6.9 *“29. This means that policies and decisions should be guided by the following principles: -*
- giving due weight to net economic benefit;*
  - responding to economic issues, challenges and opportunities, as outlined in local economic strategies;*
  - supporting good design and the six qualities of successful places;*
  - supporting delivery of infrastructure, for example transport, education, energy, digital and water”*
- 6.10 Paragraph 292 of the SPP, details how it will Support Digital Connectivity. NPF4 highlights the importance of digital infrastructure, across towns and cities, and in particular Scotland’s more remote and island areas. Scotland’s economy and social networks depend heavily on high-quality infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across the country.
- 6.11 *“292. NPF4 highlights the importance of our digital infrastructure, across towns and cities, and in particular our more remote rural and island areas. Our economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.”*
- 6.12 *“293. The planning system should support: -*
- Development which helps deliver the Scottish Governments commitment to worldclass digital connectivity.*
  - The need for networks to evolve and respond to technology improvements and new services.*
  - Inclusion of digital infrastructure in new homes and business premises; and*
  - Infrastructure provision which is sited and designed to keep environmental impacts to a minimum.”*
- 6.13 **Development Planning**



- 6.14 *“294. Local development plans should reflect the infrastructure roll-out plans of digital communications operators, community groups and others, such as the Scottish Government, the UK Government and local authorities.”*
- 6.15 *“295. Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment. They should ensure that the following options are considered when selecting sites and designing base stations: \_*
- mast or site sharing;*
  - installation on buildings or other existing structures;*
  - installing the smallest suitable equipment, commensurate with technological requirements;*
  - concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and*
  - installation of ground-based masts.”*
- 6.16 *“296. Local development plans should set out the matters to be addressed in planning applications for specific developments, including:*
- an explanation of how the proposed equipment fits into the wider network;*
  - a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;*
  - details of the design, including height, materials and all components of the proposal;*
  - details of any proposed landscaping and screen planting, where appropriate;*
  - an assessment of the cumulative effects of the proposed development combination with existing equipment in the area;*
  - details of the design, including height, materials and all components of the proposal;*
  - a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation<sup>131</sup>; and*
  - an assessment of visual impact, if relevant.”*
- 6.17 *297. Policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development. This should be done in consultation with service providers so that appropriate, universal and futureproofed infrastructure is installed and utilised.*
- 6.18 **Development Management**
- 6.19 *“298. Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document. For developments that will deliver new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy.”*
- 6.20 *“299. All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter / receiver facilities. The cumulative effects of equipment should be taken into account.”*
- 6.21 *“300. Planning Authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other*

*legislation and it is therefore not necessary for planning authorities to treat radio frequency radiation as a material consideration.”*

## 6.22 **The ‘Balancing Exercise’ – Material Considerations**

- 6.23 It is undeniable that mobile communication is now a key part of sustainable development and a vital tool in our personal lives and in all business and government operations. Each new generation of mobile communications technology has provided us with higher speed, better connection, and many more advanced features on our mobiles, and now with 5G, we can expect to experience an even more extensive range of telecommunication services. There is, therefore, currently a drive by the Scottish Government to ensure that all communities, both urban and rural, have access to the most up to date mobile technology, given the clear sustainability, social and economic benefits for doing so. As previously mentioned, the NPF is clear that ‘Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.’ This application is to provide essential new 5G coverage and improved 4G coverage and capacity within the target area.
- 6.24 The economic benefits associated with high quality mobile networks include creating cost efficiencies for businesses, charities, educational facilities and public bodies amongst others; enabling online services to be offered and extended to a wider audience; bookings can be made from anywhere in the world; ability to deliver real-time information (low latency), ultra-fast speeds (critical for high-definition images and video), increased capacity and heightened security will also facilitate learning on the job procedures, thanks to technologies such as Augmented Reality (AR) goggles, which, for example, can give the likes of engineers real-time instructions on how to fix a machine on a production line.
- 6.25 Social benefits include helping people to stay in touch wherever and whenever, which can help improve social wellbeing and inclusion and help address social isolation; convenient access to online commerce or businesses; easier contact of emergency services; ability to access and manage personal finances 24/7, access to real time transport information and timetables, smart meter reading, home working to provide better work and home life balance, contacting local authorities and using their services.
- 6.26 Sustainability and Environmental benefits include facilitating remote access to services, education, and commerce, reducing the need to travel and in turn minimising carbon emissions; better monitoring and control of energy consumption through climate change technology, smart metering and smart energy grids; Internet of Things (IOT) sensor deployment can monitor, manage and alert us in real time to pollution risks, health hazards and flood risk; driverless cars which offer better fuel efficiency; and smart cities and buildings can rely upon 5G networks to enable buildings and infrastructure to use automated energy saving through better and more efficient lighting, heating, cooling and other operations.
- 6.27 The social and economic benefits are a significant material consideration which should be weighed against the visual impact associated with the development of the proposed installation at this location.
- 6.28 In March 2023 the decision of Glasgow City Council to refuse prior approval for the installation of a 15m high monopole and associated equipment opposite 433 Keppochhill Road, Glasgow, G21 1HY, required to bring 5G to the G21 area of Glasgow, was overturned by the DPEA (Ref: PAC-260-2011). Within the decision notice, the Reporter stated that:
- 6.29 *“As a material consideration National Planning Framework 4 Policy 24, referred to above, gives support to the delivery of digital infrastructure, particularly in areas with gaps in connectivity, as is the case here with 5G. Whilst the council accepts the*

*proposal is generally consistent with the aims of the framework, for the reasons set out above in relation to its refusal of the application, it considers visual amenity has not been minimised. I am satisfied however that the criteria set out above have been met in this case and that there is strong policy support in principle for the proposed mast at national level. The council's position is maintained regarding the local development plan, and particularly supplementary guidance IPG3. As above I do not accept these views and consider that overall, the proposal draws support from the development plan as a material consideration."*

- 6.30 *"....., the proposed mast would not have any adverse impact on general visual amenity and there are no nearby residential properties. There is substantial support from the development plan as a material consideration. The council's concerns about visual amenity, clutter and footway width are understandable but in my view not justified in this case and not sufficiently great as to support dismissal of the appeal."*
- 6.31 *"Overall, I find the benefits of the proposal outweigh any other concerns. I therefore give approval, for the reasons set out above, for the siting and appearance of the development. I have considered all the other matters raised, but there are none which would lead me to alter my conclusion."*
- 6.32 In March 2023 the decision of Glasgow City Council to refuse prior approval for the installation of a 15m high monopole and associated equipment adjacent to 46 Priesthill Road, Glasgow, G53 6PY, required to bring 5G to the G21 area of Glasgow, was overturned by the DPEA (Ref: PAC-260-2010). Within the decision notice, the Reporter stated that:
- 6.33 *"Drawing all these matters together, the proposed mast would have an adverse impact on general visual amenity, including that of the nearest residential properties. It would thus be contrary at least in part to the framework's policy 24 and policies IPG 3 and CDP 3 of the local development plan and its supplementary guidance, even though overall there is strong support for digital development. This must be set against the relative freedom from existing structures along this part of the road estate. Exceptionally, I do not consider this adverse visual impact to be sufficiently significant as to justify dismissing the appeal, taking into account the substantial support from national policies as well as the local development plan. Any impact on local residential amenity would similarly not be sufficiently great as to justify dismissal."*
- 6.34 *"Overall, I find the benefits of the proposal outweigh the adverse impact on local visual residential amenity. I therefore give approval, for the reasons set out above, for the siting and appearance of the development. I have considered all the other matters raised, but there are none which would lead me to alter my conclusion."*
- 6.35 In March 2023 the decision of Glasgow City Council to refuse prior approval for the installation of a 15m high monopole and associated equipment to the west of 12 Cobden Road on Springburn Road, Glasgow, G21 1LY, required to bring 5G to the G21 area of Glasgow, was overturned by the DPEA (Ref: PAC-260-2012). Within the decision notice, the Reporter stated that:
- 6.36 *"As a material consideration National Planning Framework 4 Policy 24, referred to above, gives support to the delivery of digital infrastructure, particularly in areas with gaps in connectivity, as is the case here with 5G. I am satisfied that the criteria set out above have been met in this case and that there is strong policy support in principle for the proposed mast at national level."*
- 6.37 *".....the proposed mast would not have any adverse impact on general visual amenity and there are no nearby residential properties. There is substantial support from national policies."*
- 6.38 *"Overall I find the benefits of the proposal outweigh any other concerns."*

- 6.39 It is considered that there are strong parallels with the decisions outlined above and the subject of this appeal. Whilst it is acknowledged that there are visual effects associated with the proposed installation, the public benefits are significant and have been demonstrated throughout this appeal statement. Please refer to the appeal history captured in this statement.
- 6.40 “Forging our Digital Future with 5G” places great emphasis on the importance of 5G. “5G will be transformational for businesses, public services and for individual citizens. It is suggested that enhanced 5G capability could reduce business start-up costs, stimulate exports and increase the use of cost-reducing technologies such as cloud computing. It could provide easier access to healthcare, education and online shopping for people, wherever they live in the country.”
- 6.41 The importance of reliable mobile networks has been further emphasised by challenges faced during the recent Covid 19 pandemic enabling members of the community to continue to buy provisions, send emails, facilitate home working and communications on the move, send and receive instant messages, manage their finances, complete school projects, stream and downloading data and create mobile hotspots. The ability to facilitate home office working also reduces travel time and carbon emissions in accordance with sustainable development targets. The proposal to provide critical infrastructure allowing the provision of new 5G coverage along with improved 4G coverage and capacity therefore complies with the NPF presumption in favour of sustainability, reducing the need to travel and associated carbon footprint and providing significant social and economic benefits.

## 7.0 Discounted Options:

7.1 This is an NTQ replacement and is the sequentially preferable option and is fully in accordance with the NPPF (see below). There are no other preferable locations in the area for the equipment.

1. Installing a base station on an existing building or tall structure.
2. Upgrading an operator's own existing base station(s).
3. Using existing telecommunications structures belonging to another code system operator, i.e. mast sharing.

**If 1-3 unavailable, the only viable option is 4.**

4. Erection of a new ground-based mast.

## 7.2 Discounted Options

| Site Type | Site Name and Address            | NGR                  | Reason for not choosing   |
|-----------|----------------------------------|----------------------|---|
| D1        | Buckie Braes Allotments          | E: 310082, N: 722528 | Allotments all in use. Land is low lying, so an install in this location would not provide the required coverage  |
| D2        | Low Road (in front of Golf Club) | E: 310162, N: 722562 | Grass verge in front of the Golf Club, also low lying so would not provide replica coverage to the NTQ site.  |
| D3        | Aviva                            | E: 309993, N: 722511 | Landscaping zone associated with Aviva Pitheavlis site. Land is low lying so would not provide the required coverage.   |
| D4        | Perth High School (Old Building) | E: 309463, N: 723207 | Would have been an ideal rooftop location, however there is a new School currently under construction and understand the old building will be demolished.                     |
| D5        | Perth Royal Infirmary            | E: 310205, N: 723645 | Low lying rooftop would not provide required coverage given the inconsistent topography.  |
| D6        | Perth Leisure Centre             | E: 311021, N: 723346 | Landscaping area associated with Perth Leisure Centre. A 25m GF would be too prominent in this location. Play area also close by.   |
| D7        | LIDL                             | E: 310947, N: 723557 | A 25m greenfield site here would be too exposed in relation to Glasgow Road, so not considered at this time.  |
| D8        | ALDI                             | E: 311026, N: 723544 | Customer car parking appears to be at a premium at ALDI, with the telecoms compound potentially occupying 10 spaces. Site close to railway line so not considered due to H&S. |
| D9        | Perth Academy                    | E: 309707, N: 723015 | Playing fields associated with Perth Academy. Site would be too exposed in relation to the nearby residential properties found North, South & West.                           |
| D10       | Land at Riggs Road               | E: 310854, N: 723676 | Vacant/overgrown land to the North of LIDL. Site appears to be prime redevelopment land and has a couple of historic (withdrawn) planning applications against it.            |
| NTQ       | Cragie Hill Golf                 | E: 310265,           | Reconfiguration of existing golf course and   |



|  |      |           |  |
|--|------|-----------|--|
|  | Club | N: 722370 | club house received notice to remove due to redevelopment. |
|--|------|-----------|--|

### 7.3 Discounted Options Map



[https://gridreferencefinder.com?gr=NO0999022292|Proposed\\_s\\_Site|2,NO1008222528|D1|1,NO1016222562|D2|1,NO0999322511|D3|1,NO0946323207|D4|1,NO1020523645|D5|1,NO1102123346|D6|1,NO1094723557|D7|1,NO1102623544|D8|1,NO0970723015|D9|1,NO1085423676|D10|1,NO1026522370|NTQ\\_s\\_site|5&v=r&labels=1](https://gridreferencefinder.com?gr=NO0999022292|Proposed_s_Site|2,NO1008222528|D1|1,NO1016222562|D2|1,NO0999322511|D3|1,NO0946323207|D4|1,NO1020523645|D5|1,NO1102123346|D6|1,NO1094723557|D7|1,NO1102623544|D8|1,NO0970723015|D9|1,NO1085423676|D10|1,NO1026522370|NTQ_s_site|5&v=r&labels=1)

### 8.0 Conclusion and Planning Balance

#### 8.1 Reasoning and Summary

8.2 It is considered that the installation of the replacement proposed would not be contrary to but would contribute to the achievement of the Policy objectives of Perth and Kinross Council Development Plan, the NPF4 and SPP. The proposal would not be to the detriment of visual amenity or result in harm to the character of the area. The proposal would further the delivery of sustainable development through intelligently managed and considered change. As stated throughout this statement it is vital to consider that this is a replacement site (following receipt of the formal NTQ from the Craigie Golf Club site) and not a new additional one in the area. It is imperative that there is not a 5G coverage hole in the area and all efforts have been injected into the site selection process to deploy a proposal where the visual amenity or landscape character of the area will not be adversely affected.

- 8.3 We consider the development complies with Government guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of business and the community while minimising visual impact.
- 8.4 On balance, we consider that any perceived impact on visual and residential amenity the site may have will be outweighed by the considerable positive benefits brought to the economy and community by telecommunications (as evidenced in the Government-published Future Telecoms Infrastructure Review'). There would be no detrimental impact on the character of the area. As detailed above, the development meets the requisite criteria and standards and accords with the 'Planning for Growth' objectives.
- 8.5 As such, it is respectfully requested that the appeal be allowed.



WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley LS20 8EY

#### List of Documents being submitted

- 1\_NTQ 33480 Covering letter
- 2\_NTQ 33480 Grounds of Appeal
- 3\_NTQ 33480 ICNIRP Certificate
- 4\_NTQ 33480 Letter to Site Provider
- 5\_NTQ 33480 SSSI
- 6\_NTQ 33480\_Location Plan
- 7\_NTQ 33480\_SP Delivered
- 8\_NTQ 33480\_SP Sent
- 9\_Pages 01 to 5 001a\_visualisations
- 10\_Pages 06 to 10 001a\_visualisations
- 11\_Pages 11 to 15 001a\_visualisations
- 12\_Pages 16 to 19 001a\_visualisations
- 13\_PAK282\_33480\_PH1441\_M002\_LPA
- 14\_Planning Permission Application
- 15\_FLL\_DECISION\_NOTICE
- 16\_FLL\_REPORT\_OF\_HANDLING

Our Ref: NTQ 33480

28<sup>th</sup> May 2025

The Director of Planning - Planning and Regeneration  
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Perth  
PH1 5GD

Dear Sir/Madam,

**EE LTD & HUTCHISON UK LTD:**

**FULL PLANNING APPLICATION FOR PROPOSED TELECOMMUNICATIONS  
INSTALLATION AT:**

**PITHEAVLIS, NECESSITY BRAE, PERTH, PERTH AND KINROSS, PH2 0PZ.**

**NGR: E: 309990, N: 722292**

We write on behalf of EE Ltd & Hutchison 3G UK Ltd to make a formal full planning application for the proposed installation of telecommunications apparatus at the above location. EE Ltd & Hutchison 3G UK Ltd is a licensed operator of an electronic communications network in accordance with the Communications Act 2003. It is obliged to provide a mobile telecommunication network in the United Kingdom and to meet all reasonable customer demands.

Please find below a description of the development:

**Proposed telecommunications installation. Proposed 25.0m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works. For full details please refer to the enclosed drawings.**

The location has been identified as being necessary for EE business development and meets its specific technical and operational requirements. We now make a formal application to you as planning authority.

Please find enclosed the associated application package comprising: -

- Required number of copies of associated Planning Drawings Ref: NTQ 33480 with Required number of copies of the Statement made in support of the application which contains the following: -
- ICNIRP Certificate.
- General supporting information regarding operation of networks.
- BACS payment of £750.00 (to follow).

We trust this will be acceptable and look forward to discussing the merits of this proposal with you in the near future. In the meantime should you require any additional information or have any queries relating to this application, please do not hesitate to contact WHP at the above address.

Yours faithfully,



Guy de Rose  
Planning Manager  
[g.derose@whptelecoms.com](mailto:g.derose@whptelecoms.com)

# ICNIRP Certificate



## Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection (ICNIRP) Public Exposure Guidelines

BT plc, One Braham, Braham Street, London, E1 8EE, United Kingdom  
Three UK Limited, 450 Longwater Avenue, Green Park, Reading, Berkshire, RG2 6GF, United Kingdom

Declares that the proposed equipment and installation as detailed in the drawing numbers within the planning / General Permitted Development Order application at:

|                               |   |
|-------------------------------|---|
| <b>Site Identifier:</b>       | 30001152                                  |
| <b>Site Name:</b>             | PITHEAVLIS                                |
| <b>Address:</b>               | Pitheavlis Necessity Brae, Perth, PH2 0PZ |
| <b>RFC Drawing Pack File:</b> | 1738278_PAK282_33480_-_M002_MBNL_NTQ_GA_B |

Is designed to be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection [1] as expressed in EU Council Recommendation 1999/519/EC of 12 July 1999 "on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)".

|                              |                  |
|------------------------------|------------------|
| <b>Date Assessed:</b>        | 23/01/2025       |
| <b>Printed Date:</b>         | 9/3/2025         |
| <b>For and on behalf of:</b> | EE & H3G         |
| <b>Design Supplier:</b>      | WHP Telecoms Ltd |
| <b>Design Supplier User:</b> | Gary Jennings    |

|  |               |
|--|---------------|
| <b>Approved By:</b><br>(Senior Design Supplier): | Gary Jennings |
|--|---------------|

[1] The updated ICNIRP Guidelines published in March 2020 are covered by this declaration



**WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley, Leeds LS20 8EY**

Our Ref: NTQ 33480

28<sup>th</sup> May 2025

Aviva Insurance Limited  
Pitheavlis  
Perth  
PH2 0NH

Dear Sir/Madam,

**Proposed EE Ltd and Hutchison UK Ltd Telecommunications Installation.**

**At Pitheavlis, Necessity Brae, Perth, Perth and Kinross, PH2 0PZ**

**E: 309990, N: 722292**

I write to formally advise you that, on behalf of EE Ltd and Hutchison UK Ltd, I am submitting a Full Planning application for a Telecommunications Installation at the above-named mentioned site.

Yours faithfully,



Guy de Rose  
Planning Manager  
Email: [g.derose@whptelecoms.com](mailto:g.derose@whptelecoms.com)

WHP Telecoms Ltd, 1a Station Court, Station Road, Guiseley, Leeds LS20 8EY

## 1. Site Details

### SITE SPECIFIC SUPPLEMENTARY INFORMATION

|                  |                      |                  |   |
|------------------|----------------------|------------------|---|
| Site Name:       | Pitheavlis           | Site Address:    | Pitheavlis<br>Necessity Brae<br>Perth<br>Perth and Kinross<br>PH2 0PZ |
| NGR:             | E: 309990, N: 722292 |                  |   |
| Site Ref Number: | NTQ 33480            | Site Type: Macro | NTQ Replacement   |

## 2. Pre Application Check List

### Site Selection

|   |     |    |
|---|-----|----|
| Was an LPA mast register used to check for suitable sites by the operator or the LPA?   |     | No |
| If no explain why:<br><br>After a phone call to the LPA it was felt that the industry database was a more up to date source of information. |     |    |
| Was the industry site database checked for suitable sites by the operator:  | Yes |    |
| If no explain why:<br><br>N/A   |     |    |

### Pre-application consultation with LPA

|  |  |    |
|--|--|----|
| Date of written offer of pre-application consultation:   | 9 <sup>th</sup> December 2024 and<br>23 <sup>rd</sup> January 2025 |    |
| Was there pre-application contact:   |  | No |
| Date of pre-application contact:   | N/A  |    |
| Name of contact:   | The Director of Planning   |    |
| Summary of outcome/Main issues raised:<br><br>At the time of preparing this submission, and despite our attempt to engage in pre-application dialogue with the LPA, no comments had been received in respect to the proposals. |  |    |

## Ten Commitments Consultation

|  |       |  |  |
|--|-------|--|--|
| Rating of Site under Traffic Light Model:  | Green |  |  |
| Prior to the submission of this application the applicant initiates pre-consultation discussions with the local planning authority. This provides an opportunity for the LPA to discuss development proposals and identify site specific issues. Further consultation has also been carried out with the Ward Councillors and MSP. |       |  |  |

Summary of outcome/Main issues raised:

No responses had been received at the time of submission.

## School/College

|   |
|---|
| Location of site in relation to school/college:<br><br>There are no schools in close proximity to the site. |
| Outline of consultation carried out with school/college:<br><br>N/A   |
| Summary of outcome/Main issues raised:<br><br>N/A   |

## Civil Aviation Authority/Secretary of State for Defence/Aerodrome Operator consultation

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

## Site Provider Letter

|  |                           |  |
|--|---------------------------|--|
| Copy of Site Provider Letter enclosed? | Yes                       |  |
| Date served:                           | 28 <sup>th</sup> May 2025 |  |

### 3. Proposed Development

|  |
|--|
| The proposed site:   |
| This is a Full Planning application for a replacement Telecommunications Installation to replace the current site. The current site at Craigie Golf Club has been issued with a Notice to Quit (NTQ) |

The existing NTQ site is located at Craigie Golf Club (NGR: E:310265, N: 722370). The site is being redeveloped to reconfigure the golf course and clubhouse, along with adding a community hub, sports courts, bike trails, walking and cycling paths, parking, up to 175 homes, open spaces, landscaping, drainage, and upgraded access.

The Site Provider has issued an NTQ and now requires all equipment to be removed for redevelopment. This planning Statement is submitted in support of the application for the installation of a 25-metre high mobile phone mast at the location of PH2 0PZ. The purpose of the mast is to improve mobile network coverage and capacity in the surrounding area, addressing both increasing demand for data services and improving the overall communication infrastructure. This statement sets out the justification for the development in accordance with relevant planning policies and demonstrates the compliance with national and local planning requirements.

The proposed site is situated within a mixed-use area, with a blend of residential, commercial, and agricultural land uses. The mast would be located in a discrete position that minimizes visual impact while providing maximum coverage for mobile network services. The 25-metre structure is necessary to meet the growing demand for improved 4G and 5G mobile network services and to ensure the delivery of high-quality communications to the local community and businesses.

The proposed mast will be a monopole design, with associated equipment cabinets. The mast's height is determined by the need to reach sufficient coverage to address current and future service demands, with consideration given to technical requirements such as signal propagation and available space within the locality.

The proposed site is located at Pitheavlis, Necessity Brae, Perth, Perth and Kinross, PH2 0PZ. It is situated on a grassed area within the grounds to the east of the Aviva Pitheavlis building, as shown in Figures 1-3 below.

Figure 1:

Figure 2:

Figure 3:

The proposal involves installing a 25m High monopole and associated antennas to ensure continued and enhanced coverage for EE, H3G LTE and ESN for this area of Perth and Kinross. This installation is intended to replace the telecommunications equipment at Craigie Golf Club when this site is decommissioned. The proposed new facility will require the installation of a limited number of equipment cabinets housing radio equipment at ground level and in close proximity to the base of the pole.

The proposed site is situated within the Aviva Pitheavlis estate, off the B9112 Necessity Brae, in Perth and Kinross. This location is part of a large estate that houses the Aviva headquarters/offices. The office building is a modern corporate structure located in a suburban or semi-rural area of Perth, offering convenient access to local amenities and transport links. The site is well-connected, with easy access to the M90 motorway and public transportation options, including bus routes, rail services, and an employee shuttle service between Perth Railway Station and the Pitheavlis office.

The immediate area features a mix of corporate and residential spaces, surrounded by office buildings and mature trees. The site has been strategically chosen to take advantage of the surrounding tree coverage, which offers effective screening for residential properties on Bell



Gardens, located approximately 252 metres southeast of the site. Additionally, the office buildings provide a commercial backdrop for the installation, minimizing its visual impact from various viewpoints around the site.

As mentioned earlier, this is not a new installation but a replacement for an existing one that will be removed. The proposed installation is essential for maintaining and enhancing wireless connectivity and capacity for local businesses, residents, and visitors in this area of Perth and Kinross. It will notably improve mobile network signal strength and reliability for employees and visitors on-site. A strong signal is crucial for ensuring seamless communication for business operations and reliable network infrastructure during emergencies, particularly in rural or suburban areas like parts of Perth.

Enclose map showing the cell centre and adjoining cells:

This can be emailed to the LPA on request

#### Type of Structure

##### Description:

Description: It is imperative to consider from a planning perspective that this is purely an upgrade to existing installation – The structure already exists.

TOP OF PROPOSED TOWER +25.00m AGL  
C/L OF PROPOSED ANTENNAS +23.90m AGL  
C/L OF PROPOSED DISHES +21.00m AGL

Proposed H3G GPS module to be installed on aperture support pole.  
Proposed EE GPS module to be installed on aperture support pole.  
Proposed 25.0m high Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed antenna apertures and 4No. proposed Ø600 dishes.  
Proposed RRUs, AND BOBs to be fixed to support poles below antennas.  
Proposed compound (8m x m) from 2.4m high standard ClearVu 22 fence c/w 3.0m wide double gate. Proposed 2No. EE, 1No H3G and 1No. shared Mk5B Link/AC cabinets and overhead cable management within compound.  
Existing sloping ground to be regraded to provide level surface for proposed compound.

Overall Height: +25.00m AGL

|                             |              |
|-----------------------------|--------------|
| Height of existing building | See Drawings |
|-----------------------------|--------------|

##### Equipment Housing:

|         |              |
|---------|--------------|
| Length: | See Drawings |
|---------|--------------|

|        |              |
|--------|--------------|
| Width: | See Drawings |
|--------|--------------|

|         |              |
|---------|--------------|
| Height: | See Drawings |
|---------|--------------|

##### Materials

|  |              |
|--|--------------|
| Tower/mast etc – type of material and external colour: | See Drawings |
|--|--------------|

|   |              |
|---|--------------|
| Equipment housing – type of material and external colour: | See Drawings |
|---|--------------|

#### Reasons for choice of design:

Central Government attaches great importance to the design of the built environment and outlines this within the National Policy Framework.

The sharing of base stations between multiple operators is one of the key strategic policy principles contained within the Scottish Planning Policy and NPF4.

In keeping with the NPF. guidelines of using “high quality communications infrastructure”, the proposed design has been selected to minimise visual impact upon the street scene.

#### 4. Technical Information

|   |     |  |
|---|-----|--|
| ICNIRP Declaration attached   | Yes |  |
| ICNIRP public compliance is determined by mathematical calculation and implemented by careful location of antennas, access restrictions and/or barriers and signage as necessary. Members of the public cannot unknowingly enter areas close to the antennas where exposure may exceed the relevant guidelines. |     |  |
| When determining compliance the emissions from all mobile phone network operators on the site are taken into account.   |     |  |

|  |  |
|--|--|
| Frequency:   | This information can be supplied to the LPA on request |
| Modulation characteristics <sup>1</sup>  | This information can be supplied to the LPA on request |
| Power output (expressed in EIRP in dBW per carrier)<br><br>In order to minimise interference within its own network and with other radio networks, (EE) operates its network in such a way the radio frequency power outputs are kept to the lowest levels commensurate with effective service provision<br><br>As part of (EE)’s network, the radio base station that is the subject of this application will be configured to operate in this way. | This information can be supplied to the LPA on request |
| Height of antenna (m above ground level)   | +25.00 AGL   |

#### 5. Technical Justification

|  |
|--|
| Reason(s) why site required  |
| The National Planning Framework clearly states that authorities should not question the need for the service, nor seek to prevent competition between operators. Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network. |

<sup>1</sup> The modulation method employed in GSM is GMSK (Gaussian Minimum Shift Keying) which is a form of Phase modulation

The modulation method employed in UMTS is QPSK (Quad Phase Shift Keying) which is another form of Phase Modulation

Notwithstanding this fact, the Applicant considers it to be important to explain the technical justification for the site and how the facility fits into the overall network.

The site is required to provide enhanced coverage for EE and H3G in order to improve coverage in the PH2 area of Perth and Kinross. The cell search areas for 5G are extremely constrained with a typical cell radius of approximately 250m meaning that it would not be feasible to site the installation outside of this locale.

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

### Discounted Options

In accordance with the sequential approach outlined in the National Planning Framework (NPF) following search criteria have been utilised. Firstly consideration is always given to sharing any existing telecommunication structures in the area, secondly consideration is then given to utilising any suitable existing structures or buildings and thirdly sites for freestanding ground based installations are investigated.

This sequential approach is outlined below:

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

In compliance with its licence and the sequential approach outlined in the NPF4 all attempts to utilise any existing telecommunication structures where they represent the optimum environmental solution have been employed. The Ofcom Site Finder mast register is always examined prior to the submission of an application.

If no alternative site options have been investigated, please explain why:

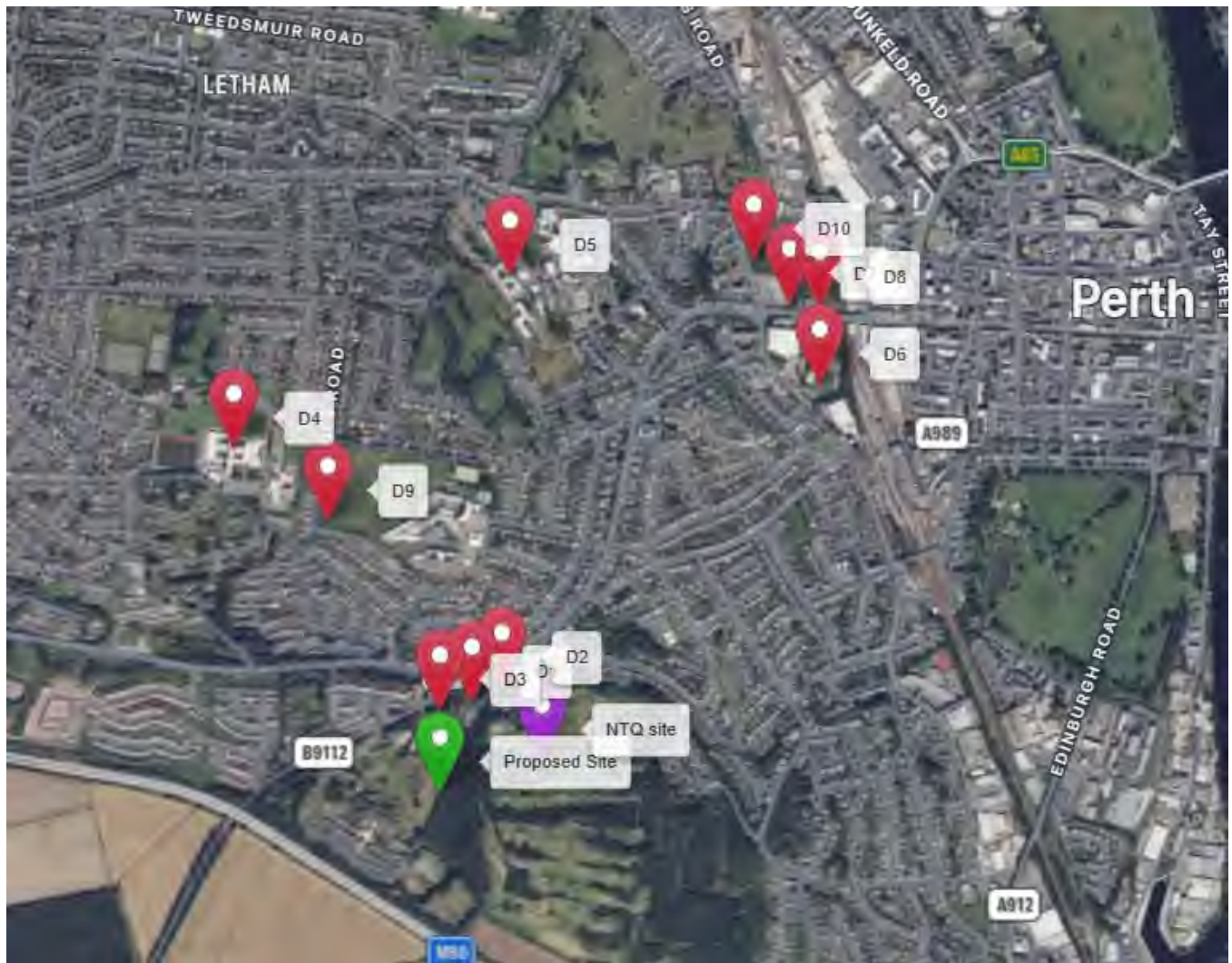
N/A

### Discounted Options:

| Site Type | Site Name and Address            | NGR                  | Reason for not choosing   |
|-----------|----------------------------------|----------------------|---|
| D1        | Buckie Braes Allotments          | E: 310082, N: 722528 | Allotments all in use. Land is low lying, so an install in this location would not provide the required coverage      |
| D2        | Low Road (in front of Golf Club) | E: 310162, N: 722562 | Grass verge in front of the Golf Club, also low lying so would not provide replica coverage to the NTQ site.          |
| D3        | Aviva                            | E: 309993, N: 722511 | Landscaping zone associated with Aviva Pitheavlis site. Land is low lying so would not provide the required coverage. |
| D4        | Perth High School                | E: 309463,           | Would have been an ideal rooftop location,  |

|     |                       |                         |   |
|-----|-----------------------|-------------------------|---|
|     | (Old Building)        | N: 723207               | however there is a new School currently under construction and understand the old building will be demolished.  |
| D5  | Perth Royal Infirmary | E: 310205,<br>N: 723645 | Low lying rooftop would not provide required coverage given the inconsistent topography.  |
| D6  | Perth Leisure Centre  | E: 311021,<br>N: 723346 | Landscaping area associated with Perth Leisure Centre. A 25m GF would be too prominent in this location. Play area also close by.   |
| D7  | LIDL                  | E: 310947,<br>N: 723557 | A 25m greenfield site here would be too exposed in relation to Glasgow Road, so not considered at this time.  |
| D8  | ALDI                  | E: 311026,<br>N: 723544 | Customer car parking appears to be at a premium at ALDI, with the telecoms compound potentially occupying 10 spaces. Site close to railway line so not considered due to H&S. |
| D9  | Perth Academy         | E: 309707,<br>N: 723015 | Playing fields associated with Perth Academy. Site would be too exposed in relation to the nearby residential properties found North, South & West.                           |
| D10 | Land at Riggs Road    | E: 310854,<br>N: 723676 | Vacant/overgrown land to the North of LIDL. Site appears to be prime redevelopment land and has a couple of historic (withdrawn) planning applications against it.            |
| NTQ | Cragie Hill Golf Club | E: 310265,<br>N: 722370 | Reconfiguration of existing golf course and club house received notice to remove due to redevelopment.  |

## Discounted Options Map:



[https://gridreferencefinder.com?gr=NO0999022292|Proposed\\_s\\_Site|2,NO1008222528|D1|1,NO1016222562|D2|1,NO0999322511|D3|1,NO0946323207|D4|1,NO1020523645|D5|1,NO1102123346|D6|1,NO1094723557|D7|1,NO1102623544|D8|1,NO0970723015|D9|1,NO1085423676|D10|1,NO1026522370|NTQ\\_s\\_site|5&v=r&labels=1](https://gridreferencefinder.com?gr=NO0999022292|Proposed_s_Site|2,NO1008222528|D1|1,NO1016222562|D2|1,NO0999322511|D3|1,NO0946323207|D4|1,NO1020523645|D5|1,NO1102123346|D6|1,NO1094723557|D7|1,NO1102623544|D8|1,NO0970723015|D9|1,NO1085423676|D10|1,NO1026522370|NTQ_s_site|5&v=r&labels=1)

## 7. Additional Relevant Information

### Background to the Proposal

|          |       |               |  |
|----------|-------|---------------|--|
| Site Ref | 33480 | Site Address: | Pitheavlis, Necessity Brae, Perth, PH2 0PZ |
|----------|-------|---------------|--|

Local Planning Authority: Perth & Kinross Council

Development Plan: Perth & Kinross Local Development Plan 2 (2019)

Site and its surrounds (PKC LP2 Map Extract – reference only)



The site is designated as being in the settlement boundary, in an area identified for employment use. The site designation is not a material consideration.

Perth & Kinross Council does have specific telecoms policy. This, together with NPF4, is of relevance. The National Planning Policy section of this supporting statement goes into detailed analysis of why this site is in compliance with NPF4.

### **Policy Analysis:**

Policy **59** reads:

“Digital Infrastructure

The Council will support development that provides digital and mobile communications infrastructure to homes and businesses and improves quality of life for residents and workers provided the environmental impacts on the natural and built environment are minimised.

The Plan is particularly supportive of the expansion of broadband and mobile communications services in rural areas.

The Digital Economy Act 2017 enables everyone in the UK to request a broadband download speed of at least 10Mbps by 2020 under a Universal Service Obligation. This will mainly affect rural areas but also some urban areas.

Developers should therefore make provision for digital infrastructure in all new-built development in urban and rural areas as an integral part of the development.

Equipment should be designed and positioned as sensitively as possible although some technical requirements may limit this. The visual impact of communications infrastructure will play a significant part in the determination of planning applications.

The siting and design of communication infrastructure should consider all the following series of options when selecting sites:

- (a) installation of smallest suitable equipment;
- (b) concealing/disguising masts, antennas, equipment houses;
- (c) site/mast sharing;
- (d) installation on existing building and structures; and
- (e) installation of ground-based masts.

Planning applications for communications infrastructure should address the following matters:

- (a) an explanation of how the proposed equipment fits into the wider network;
- (b) a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- (c) details of the design, including height, materials and all components of the proposal;
- (d) details of any proposed landscaping and screen planting, where appropriate;
- (e) an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- (f) a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP (International Commission on Non-Ionizing Radiation Protection) guidelines that give recommendations for limiting exposure to and absorption of the high-frequency energy fields emitted by mobile phone communication base stations;
- (g) an assessment of visual impact, if relevant; and
- (h) ancillary associated works associated with the development, including but not limited to access tracks and security fencing.

In all cases the Council will require the removal of the development and associated equipment and the restoration of the site whenever the consent expires or the project ceases to operate for a specific period.”

This proposed development at the site seeks to consolidate all requisite elements (for site sharing) into one location, minimised to ensure the scale and mass of the design is sympathetic to its surrounds, thus limiting visual impact on the wider character of the area and being suitably distant from sensitive receptors, yet providing capacity to ensure that it would deliver the level of service needed in this location. In this regard the proposal would accord with the Development Plan.

The LPA should look to support this proposal as the equipment will bring coverage to the area where there is currently no or low connectivity capacity. Furthermore, the discounted options section of this planning statement fully illustrates that all other potential masts, roof tops and other locations have been investigated. The proposed site is the optimum location from a planning and coverage perspective.

The proposed development at the site seeks utilise the height of surrounding topography and neighbouring trees, which to a degree, provide screening of the lower level development, which together with the distance from the highway to the west ensures visual effects are minimised.

In this instance a planning balance is required. It is accepted the scheme would qualify as a visual change but it is also needs to be accepted that the proposal has sought to minimise visual detracton from the wider character of the area (being set back from the highway, and seen against the existing backdrop of varying topography). Furthermore, the development, set to the side of the Listed Building to the south, would ensure that heritage assets’ setting was not harmed.

In this case, with the evident public benefits the development would bring to the area, it is

considered the proposal accords with both adopted policy and the visions and objectives of the Council and the Scottish and UK Governments.

Knowing the above it is considered that, on balance, the provision of the scheme as detailed would have a suitably limited effect on the wider landscape character or heritage asset (to the south), with any perceived harm being sufficiently outweighed by the considerable benefits for the wider public, and deliver on the need for digital coverage in the area.

It fully accords with the requirements of NPF4.

Mobile phone base stations operate on a low power and accordingly base stations therefore need to be located in the areas they are required to serve. Increasingly, people are also using their mobiles in their homes and this means we need to position base stations in, or close to, residential areas.

A further limiting factor is that the position has to be one that fits in with the existing network. Sites have to form a patchwork of coverage cells with each cell overlapping to a limited degree with the surrounding base stations to provide continuous network cover as users move from one cell to the other. However if this overlap is too great unacceptable interference is created between the two cells.

## **NATIONAL PLANNING POLICY**

The Fourth National Planning Framework (NPF4)

The NPF4 was adopted 13th February 2023. It details the Scottish Government's long term plan for what Scotland could be in 2045 and will influence planning decisions. The NPF4 encourages LDP's to support the delivery of digital infrastructure, including fixed line, and mobile connectivity, particularly in areas with gaps in connectivity and barrier to digital access. Policy 24 reads "Development proposals that incorporate appropriate, universal, and future-proofed digital infrastructure will be supported"

Part 1– sets out an overarching spatial strategy for Scotland in the future. This includes priorities, spatial principles and action areas. This should be used to guide the preparation of regional spatial strategies, local development plans and local place plans. The strategy is relevant to wider policies and strategies relating to land use.

Part 1 of the Plan sets out aspirations to stimulate green prosperity, stating that natural assets and environmental quality underpin the area's main economic sectors and must therefore be protected, restored and used sustainably. A flexible approach to planning will help to attract investment, grow and diversify businesses and enable local entrepreneurship, micro enterprises, self-employment and social enterprises to flourish. Remote working can be capitalised on to build economically active local communities. The Plan acknowledges that achieving these aspirations will require the continued roll out of high-quality digital infrastructure and maintenance and decarbonisation of transport routes to wider markets.

Part 2– sets out proposed national developments that support the spatial strategy.

Part 3– sets out policies for the development and use of land which are to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part should be taken as a whole, and all relevant policies should be applied to each application.

Part 3 is a 'Planning Policy Handbook' and covers the following themes:

- Sustainable Places (Universal policies)
- Liveable Places
- Productive Places
- Distinctive Places

In respect of 'Digital infrastructure', NPF4 states 'We want our all of our places to be digitally connected. Digital connectivity has a central role to play in unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and population growth. This will play an increasingly important role in supporting essential services including healthcare and education. We want to ensure that no areas are left behind by closing the digital divide. The planning system should continue to support the roll-out of digital infrastructure across all of Scotland, ensuring that policies recognise the importance of future-proofing infrastructure provision whilst addressing impacts on local communities and the environment'.

With regards NPF4, Policy **24** is relevant. It reads:

"Policy 24

- 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."

Forging Our Digital Future With 5G: A Strategy for Scotland (2019)

The Foreword notes that the technological revolution will be a significant opportunity for Scotland over the coming years. The rollout of 4G and 5G is the next wave and will potentially see huge social, economic and environmental benefits to the whole country. While the UK's mobile network operators are already investing large sums in rolling out 4G and 5G, we must act collectively to ensure that all of Scotland – including rural areas – benefits from this revolution. The prize is a boost to our nation's fortunes, creating better, healthier and happier lives for everyone.

The Scottish Government's aspiration is for Scotland to be at the forefront of this revolution and, ultimately, to establish the whole country as a leading 5G digital nation.

It is estimated that with 5G capability, Scotland has the potential to add £17 billion to GDP by 2035, create 160,000 new jobs and increase productivity by £1,600 per worker. 5G could play a part in creating 3,100 new businesses and a £3.3 billion growth in export volumes.

Significantly, 4G and 5G also has the potential to help sustain remote and rural areas, allowing all of Scotland's citizens and communities to embrace the technology and reap its benefits.

To make this happen, the Scottish Government is working with a range of organisations and interested parties to ensure the swift national deployment of 4G and 5G.

The Scottish Government has an aspiration for Scotland to be among the global leaders in IOT and the adoption of sensor technologies, which will help drive economic growth, transform public services and give citizens better and healthier lives.

Scottish Planning Policy: Advanced, high quality electronic communications infrastructure is an essential component of economic growth across Scotland. It also has a role in reducing the need to travel, particularly the need for commuting and other business travel by enabling alternative working patterns, therefore contributing to reduce emissions. Planning authorities should support the expansion of the electronic communications network, including telecommunications, broadband and digital infrastructure, through the development plan and development management decisions, taking into account the economic and social implications of not having full coverage or capacity in an area. The Government's objective is to ensure that everyone can enjoy the same degree of access to high quality electronic communication opportunities. This should be achieved in a way that keeps the environmental impact of communications infrastructure to a minimum. (para 248).

### **Scottish Planning Policy 2014 (SPP)**

Scottish Planning Policy published June 23<sup>rd</sup> 2014, is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed across the country. SPP is supplemented by a series of Planning Advice Notes (PANs).

Paragraphs 292 – 300 of the SPP relate specifically to Supporting Digital Connectivity, including telecommunications developments. It highlights the importance of our digital infrastructure, across the whole of Scotland, including urban and rural areas and confirms that Scotland's economy and social networks depend heavily on high-quality digital infrastructure. To facilitate investment across Scotland, planning has an important role to play in strengthening digital communications capacity and coverage across Scotland.

The proposed development accords with all these aspects of the NPF4 and SPP in that it will provide EE and the 3ES with new and improved network provision within the PH2 area of the Perth & Kinross bringing a range of associated economic and technical benefits.

*Paragraph 295 of the SPP confirms that Local development plans should provide a consistent basis for decision-making by setting out the criteria which will be applied when determining planning applications for communications equipment. They should ensure that the following*



*options are considered when selecting sites and designing base stations:*

- *mast or site sharing;*
- *installation on buildings or other existing structures;*
- *installing the smallest suitable equipment, commensurate with technological requirements;*
- *concealing or disguising masts, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate; and*
- *installation of ground-based masts.*

In accordance with paragraph 295 the applicant has demonstrated that there are no suitable, available or deliverable existing sites and this proposed new installation is justified.

Policy 296 confirms that “Local development plans should set out the matters to be addressed in planning applications for specific developments, including:

- an explanation of how the proposed equipment fits into the wider network;
- a description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- details of the design, including height, materials and all components of the proposal;
- details of any proposed landscaping and screen planting, where appropriate;
- an assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation (*The radiofrequency public exposure guidelines of the International Commission on Non-Ionising Radiation Protection, as expressed in EU Council recommendation 1999/519/ EC on the limitation of exposure of the general public to electromagnetic fields.*); and
- an assessment of visual impact, if relevant”.

It is considered that the applicant has addressed all matters set out in the ‘model’ telecommunications policy.

In assessing applications for developments, paragraph 298 of SNP confirms that *“Consideration should be given to how proposals for infrastructure to deliver new services or infrastructure to improve existing services will contribute to fulfilling the objectives for digital connectivity set out in the Scottish Government’s World Class 2020 document. For developments that will deliver entirely new connectivity – for example, mobile connectivity in a “not spot” – consideration should be given to the benefits of this connectivity for communities and the local economy”.*

Paragraph 299 of SPP states: *“All components of equipment should be considered together and designed and positioned as sensitively as possible, though technical requirements and constraints may limit the possibilities. Developments should not physically obstruct aerodrome operations, technical sites or existing transmitter/receiver facilities. The cumulative visual effects of equipment should be taken into account”.*

Paragraph 300 of SPP states “Planning authorities should not question the need for the service to be provided nor seek to prevent competition between operators. The planning system should not be used to secure objectives that are more properly achieved under other legislation. Emissions of radiofrequency radiation are controlled and regulated under other legislation and it is therefore not necessary for planning authorities to treat radiofrequency radiation as a material consideration”.

## **Planning Advice Note: Scottish Government Planning Guidance: Digital Telecommunications**

The Scottish Government Planning Guidance: Digital Telecommunications refers to Radio Telecommunications and states that the NPPG considers the general siting and design principles for telecommunications. It states that such development should be undertaken in a manner that minimises environmental impact and should have a sensitive design in both urban and rural areas.

Paragraph 32 identifies two components associated with minimising the contrast between telecommunication equipment and its surroundings; *minimising contrast between equipment and people's expectations of a particular scene and minimising the contrast between equipment and its immediate setting or background*. For example, a lattice mast generally fits expectations about industrial landscapes and fitting antennas to an electricity pylon or painting antennas to match the façade of a building can reduce contrast.

Paragraph 33 identifies ways in which to minimise this contrast, these are as follows:

- *select a shape and material appropriate to the character of the area;*
- *keep the shape simple with clean lines, and fit all the elements, such as antennas, cables and ladders within the visual envelope of the basic shape;*
- *develop a composition where the properties seem in proportion and balanced, for example masts that taper to the top are usually more acceptable;*
- *minimise the number of separate visual elements in a base station; and*
- *use regularity, order and symmetry in positioning equipment*

Furthermore, paragraph 34 identifies a series of options that should be considered as a guide for selecting the site and design of telecommunications that minimise contrast operators. The implementation of telecommunications is site-specific and therefore should be considered against the site conditions and coverage and capacity requirements in addition to technical constraints and landscape character. The options are;

- *installing small scale equipment;*
- *concealing or disguising equipment;*
- *mast sharing;*
- *site sharing;*
- *installing on existing buildings or other structures; and*
- *erecting a new ground-based mast.*

### **Fixing the Foundations: Creating a more prosperous nation (July 2015)**

This document known as the 'Productivity Plan' sets out a 15-point plan that the government will put into action to boost the UK's productivity growth, centered around two key pillars: encouraging long-term investment, and promoting a dynamic economy. It sets out the government's long-term strategy for tackling the issues that matter most for productivity growth.

Chapter 7 of the Productivity Plan refers to 'World-class digital infrastructure in every part of the UK'.

The Plan states a '*Reliable and high quality fixed and mobile broadband connections support growth in productivity, efficiency and labour force participation across the whole economy. They enable new and more efficient business processes, access to new markets and support*

*flexible working and working from home. Investment in high speed broadband will support long-term economic growth, with GVA increasing by £6.3 billion, causing a net increase of 20,000 jobs in the UK by 2024.<sup>1</sup> Geographic coverage and take-up of superfast broadband in the UK is already the highest of the 5 largest EU economies.<sup>2</sup> The government's superfast broadband programme is passing an additional 40,000 premises every week – superfast speeds of at least 24Mbps will be available to 95% of UK households by 2017'.*

By reducing regulatory red tape and barriers to investment, the government has committed to support the market to deliver the internationally competitive fixed and mobile digital communications infrastructure the UK's businesses need to thrive and grow, and which will enable the UK to remain at the forefront of the digital economy. The government is working with business so that the market can play the lead role in delivering against the ambitions set out in the Digital Communications Infrastructure Strategy, published in March, of near-universal 4G and ultrafast broadband coverage.

## Conclusion


We consider the development complies with both central government and local planning policy guidance where the underlying aim is to provide an efficient and competitive telecommunication system for the benefit of the community while minimising visual impact.

Taking into account the factors of technical constraints, available sites and planning constraints we consider that this site and design clearly represents the optimum environmental solution.

On the basis of a recognised need to expand and promote telecommunications networks across the region, it is considered that the proposal fully accords with the requirements of the National Planning Framework and Local Plan Policies.

Guy de Rose  
Planning Manager  
Email: [g.derose@whptelecoms.com](mailto:g.derose@whptelecoms.com)

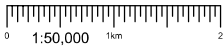
## Contact Details

|               |   |   |  |
|---------------|---|---|--|
| Name: (Agent) | Guy de Rose   | Telephone:                                |  |
| Operator:     | EE and H3G LTE  | Fax no:                                   | N/A  |
| Address:      | WHP<br>1a Station Court<br>Station Road<br>Guiseley<br>Leeds<br>LS20 8EY            | Email Address:                            | <a href="mailto:g.derose@whptelecoms.com">g.derose@whptelecoms.com</a> |
| Signed:       |  | Date:                                     | 28 <sup>th</sup> May 2025  |
| Position:     | Planning Manager  | Company:<br>(on behalf of above operator) | WHP  |

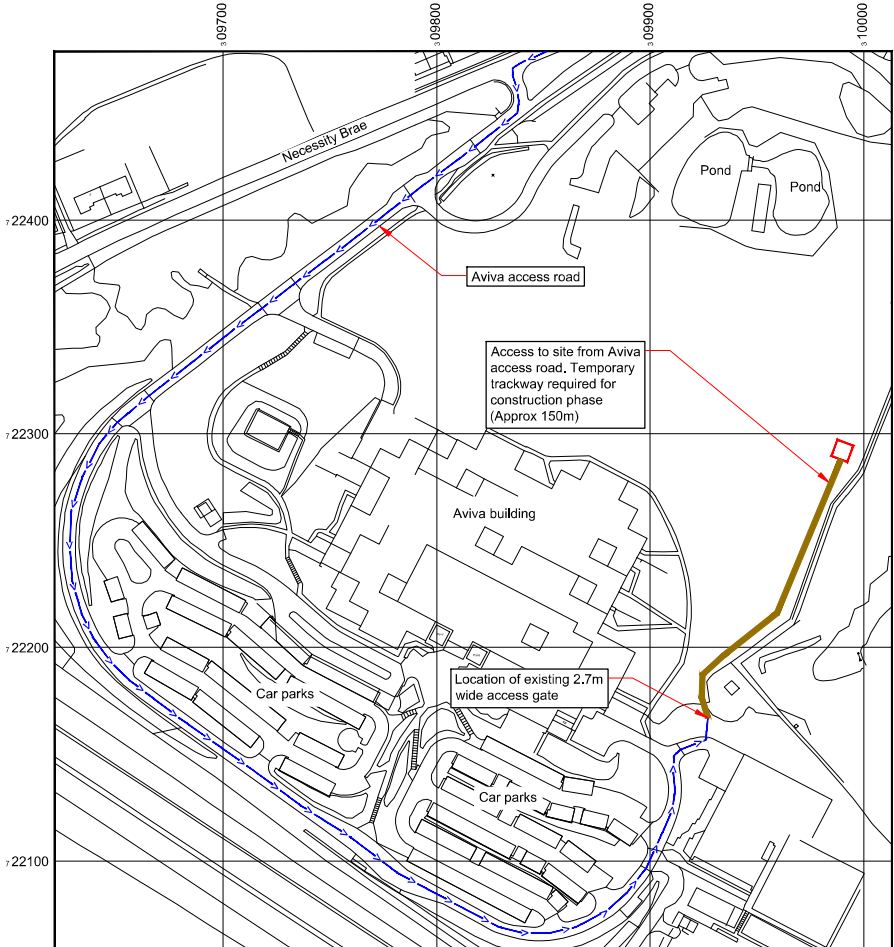


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SITE AREA PLAN

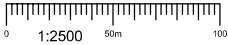


SITE PHOTOGRAPH



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SITE LOCATION PLAN



GOOGLE MAPS  
QR CODE

GOOGLE MAPS - Hyperlink to map of the site  
GOOGLE STREETVIEW - Hyperlink to streetview of the site

NOTES:

ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

DIRECTIONS TO SITE:

Head north-west on M90, Continue to end of Motorway (Junction 12). At the roundabout, take the 3rd exit onto A93. At next roundabout, take the 2nd exit and stay on A93. After 0.9 miles turn right onto Necessity Brae/B9112. After 0.1 miles turn left into Aviva grounds. Follow access road around Aviva building and car parks and through 2.7m wide field gate onto grassed area. Site is accessed across grassed area approx 150m from gate.

Site:

Access Route To Site:

Access Route:

|           |                 |                                 |     |                   |          |        |   |
|-----------|-----------------|---------------------------------|-----|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | B |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | J.R.            | Tower Change.                   |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | A |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | J.Rossi         | First Issue.                    |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |

Hutchison 3G UK Limited  
Green Park, 480 Langston Avenue  
Reading RG2 9AP  
Tel: 01235 785 000  
Fax: 01235 785 001

H3G Base Station Information line  
(0800 0044333)  
Available Monday to Friday

Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW

Tel: 01707 315000  
Fax: 01707 315001

Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

WHP Telecoms  
Castleview House,  
Calder Island Way, Wakefield  
WF2 7AW

Tel: 01925 424 100  
e-mail: info@whptelecoms.com

Site Name:

PITHEAVLIS

Site ID:

1738278

Address:

NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title:

002 SITE LOCATION PLAN

Project:

NTQ

Purpose of Issue:

PLANNING

|                             |               |              |
|-----------------------------|---------------|--------------|
| EE Call ID:                 | MBNL Call ID: | 3UK Call ID: |
| 33480                       | PAK282        | -            |
| Master Drawing No:          |               |              |
| 1738278_PAK282_33480_-_M002 |               |              |
| Issue:                      |               |              |
| B                           |               |              |

## Guy De Rose

---

**From:** Mail Delivery System <MAILER-DAEMON@esvacloud.com>  
**To:** contactus@aviva.com  
**Sent:** 28 May 2025 21:23  
**Subject:** Relayed: FAO Aviva Estates Department - Site Provider Letter: NTQ 33480 Pitheavlis, Necessity Brae, Perth, Perth and Kinross, PH2 0PZ

This is the mail system at host sitec.esvacloud.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<contactus@aviva.com>: delivery via  
cluster8.eu.messagelabs.com[195.245.230.198]:25: 250 ok 1748463767 qp 1006  
server-3.tower-856.messagelabs.com!1748463766!5479829!1



## Guy De Rose

---

**From:** Guy De Rose  
**Sent:** 28 May 2025 21:22  
**To:** 'contactus@aviva.com'  
**Subject:** FW: FAO Aviva Estates Department - Site Provider Letter: NTQ 33480 Pitheavlis, Necessity Brae, Perth, Perth and Kinross, PH2 0PZ  
**Attachments:** NTQ 33480 Letter to Site Provider v1.doc; NTQ 33480\_Location Plan.pdf; PAK282\_33480\_PH1441\_M002\_LPA.pdf

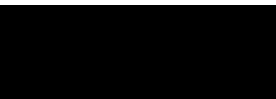
### Please forward to the Estates Department

Dear Sir/Madam

I write to formally advise you that, on behalf of EE Ltd and Hutchison UK Ltd, I am submitting a Full Planning application for the installation of a Telecommunications Installation at the site listed below.

Please find attached the Site Provider Letter for the following site: **NTQ 33480 Pitheavlis, Necessity Brae, Perth, Perth and Kinross, PH2 0PZ**

Kind regards



Guy de Rose

**WHP Telecoms Ltd**, 401 Faraday Street, Birchwood Park, Warrington, Cheshire, WA3 6GA

☎ Switchboard: 01925 424100 ☎ Direct: 01925 424100

✉ [g.derose@whptelecoms.com](mailto:g.derose@whptelecoms.com) 🌐 [www.whptelecoms.com](http://www.whptelecoms.com)



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**From:** Guy De Rose  
**Sent:** 28 May 2025 21:20  
**To:** contactus@aviva.com  
**Subject:** FAO Estates Department - Site Provider Letter:

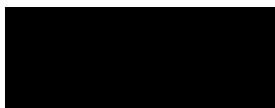
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 WF3 3HA

Tel: 01924 876777 Fax: 01924 876778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

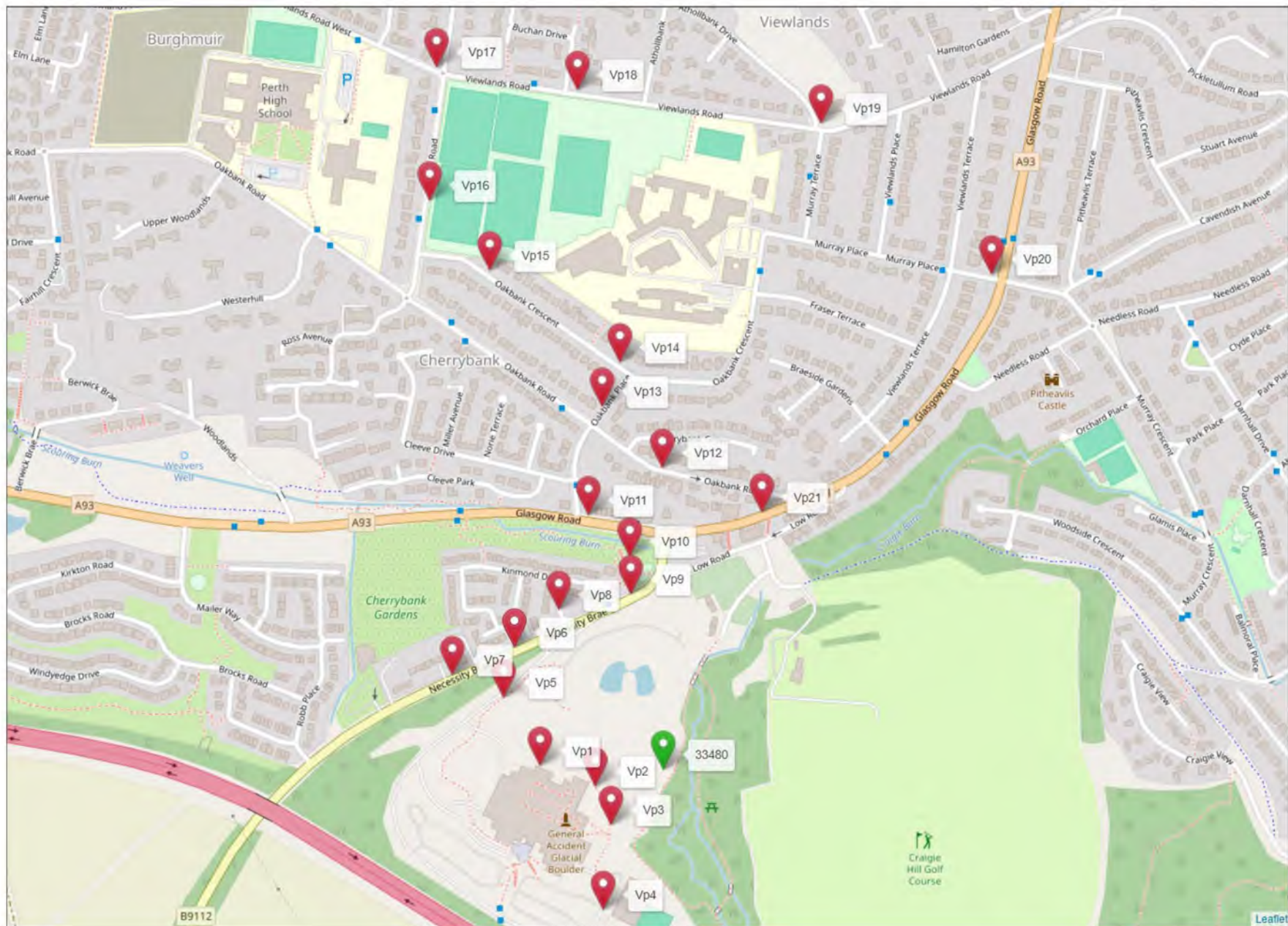
**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: Viewpoint Locations**

**Image Capture Date: 14/02/2025**  
**Spec: 12MP / FL: 28mm / f/2.2**





Title:  
Proposed Telecommunications  
Installation  
EE\_33480\_MBNL\_PAK482

Site:  
Pitheavlis  
Necessity Brae  
Perth  
Perth and Kinross  
PH2 OPZ

Purpose of issue: Planning

Image: Viewpoint Locations

Image Capture Date: 14/02/2025  
Spec: 12MP / FL: 28mm / f/2.2



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**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 1 - Existing**





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**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
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**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 1 - Proposed**





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**Site:**  
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**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 2 - Existing**





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**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
 Pitheavlis  
 Necessity Brae  
 Perth  
 Perth and Kinross  
 PH2 0PZ

**Purpose of issue: Planning**

**Image: View 2 - Proposed**





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**Title:**  
**Proposed Telecommunications**  
**Installation**  
**EE\_33480\_MBNL\_PAK482**

**Site:**  
 Pitheavlis  
 Necessity Brae  
 Perth  
 Perth and Kinross  
 PH2 0PZ

**Purpose of issue: Planning**

**Image: View 3 - Existing**





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**Title:**  
**Proposed Telecommunications**  
**Installation**  
**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 3 - Proposed**





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 e-mail: info@wilkinson-helsby.co.uk

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**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 4 - Not Visible**





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 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
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**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 5 - Existing**





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 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 5 - Proposed**





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Lofthouse Gate, Wakefield  
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e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications  
Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis  
Necessity Brae  
Perth  
Perth and Kinross  
PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 6 - Existing**





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 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 6 - Proposed**





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**Title:**  
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**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
 Pitheavlis  
 Necessity Brae  
 Perth  
 Perth and Kinross  
 PH2 0PZ

**Purpose of issue: Planning**

**Image: View 7 - Not Visible**





**WHP Wilkinson Helsby**  
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 Lofthouse Gate, Wakefield  
 WF3 3HA

Tel: 01924 878777 Fax: 01924 878778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 8 - Not Visible**





**WHP Wilkinson Helsby**  
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 WF3 3HA

Tel: 01924 876777 Fax: 01924 876778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 9 - Existing**





**WHP Wilkinson Helsby**  
 Connaught House, Park View,  
 Lofthouse Gate, Wakefield  
 WF3 3HA

Tel: 01924 876777 Fax: 01924 876778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

**Image: View 9 - Proposed**





**WHP Wilkinson Helsby**  
 Connaught House, Park View,  
 Lofthouse Gate, Wakefield  
 WF3 3HA

Tel: 01924 876777 Fax: 01924 876778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
 Pitheavlis  
 Necessity Brae  
 Perth  
 Perth and Kinross  
 PH2 0PZ

**Purpose of issue: Planning**

**Image: View 10 - Existing**





**WHP Wilkinson Helsby**  
 Connaught House, Park View,  
 Lofthouse Gate, Wakefield  
 WF3 3HA

Tel: 01924 876777 Fax: 01924 876778  
 e-mail: info@wilkinson-helsby.co.uk

**Title:**  
**Proposed Telecommunications**  
**Installation**

**EE\_33480\_MBNL\_PAK482**

**Site:**  
**Pitheavlis**  
**Necessity Brae**  
**Perth**  
**Perth and Kinross**  
**PH2 0PZ**

**Purpose of issue: Planning**

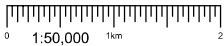
**Image: View 10 - Proposed**



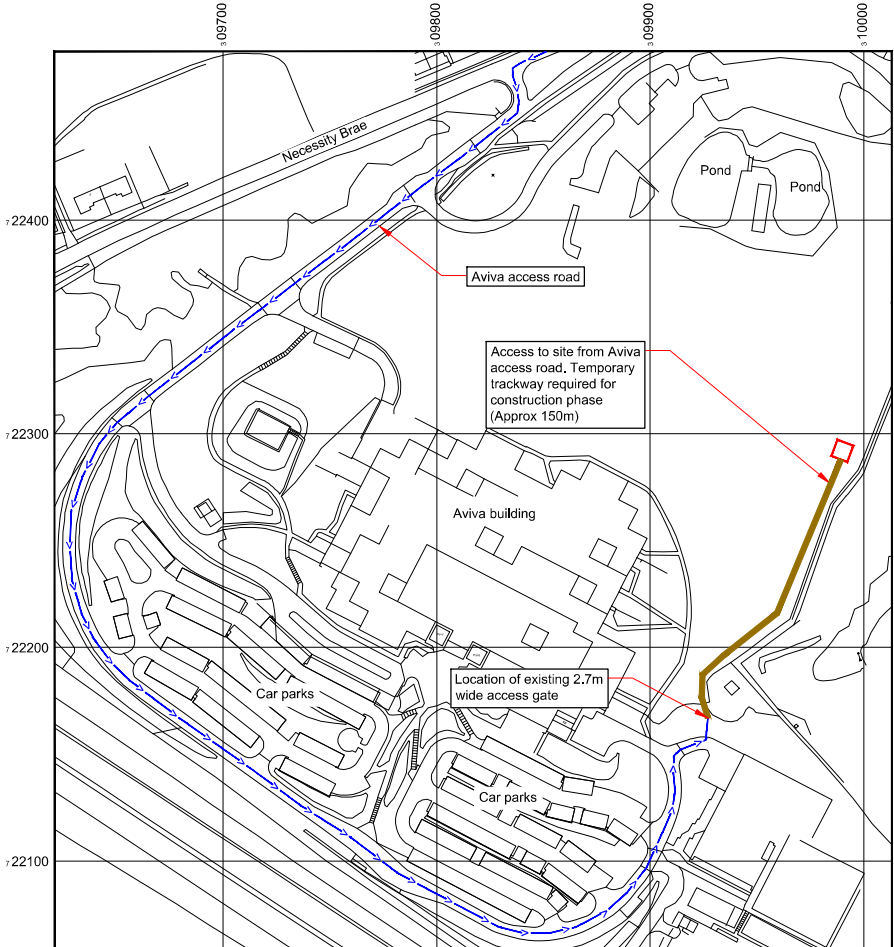


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SITE AREA PLAN

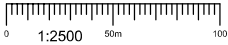


SITE PHOTOGRAPH



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SITE LOCATION PLAN



GOOGLE MAPS  
QR CODE

GOOGLE MAPS - Hyperlink to map of the site  
GOOGLE STREETVIEW - Hyperlink to streetview of the site

NOTES:

ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

DIRECTIONS TO SITE:


Head north-west on M90, Continue to end of Motorway (Junction 12). At the roundabout, take the 3rd exit onto A93. At next roundabout, take the 2nd exit and stay on A93. After 0.9 miles turn right onto Necessity Brae/B9112. After 0.1 miles turn left into Aviva grounds. Follow access road around Aviva building and car parks and through 2.7m wide field gate onto grassed area. Site is accessed across grassed area approx 150m from gate.

Site:

Access Route To Site:

Access Route:

|           |                 |                                 |     |                   |          |        |   |
|-----------|-----------------|---------------------------------|-----|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | B |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | J.R.            | Tower Change.                   |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | A |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | J.Rossi         | First Issue.                    |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |




Hutchison 3G UK Limited

Green Park, 480 Langston Avenue

Reading RG2 0JF

Tel: 01234 765 000

Fax: 01234 765 001



Hutchison 3G UK Limited

Green Park, 480 Langston Avenue

Reading RG2 0JF

Tel: 01234 765 000

Fax: 01234 765 001

H3G Site Station Information Line

0200 700 000

Available Monday to Friday

Hatfield Business Park


Hatfield

Hertfordshire

AL10 9BW

Tel: 01707 315000


Fax: 01707 315001



Mobile Broadband Network Limited

Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:



WHP Telecoms

Castletown House,

Calder Island Way, Wakefield

WF2 7AW

Tel: 01925 424 100

e-mail: info@whptelecoms.com

Site Name:

PITHEAVLIS

Site ID:

1738278

Address:

NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title:

002 SITE LOCATION PLAN

Project:

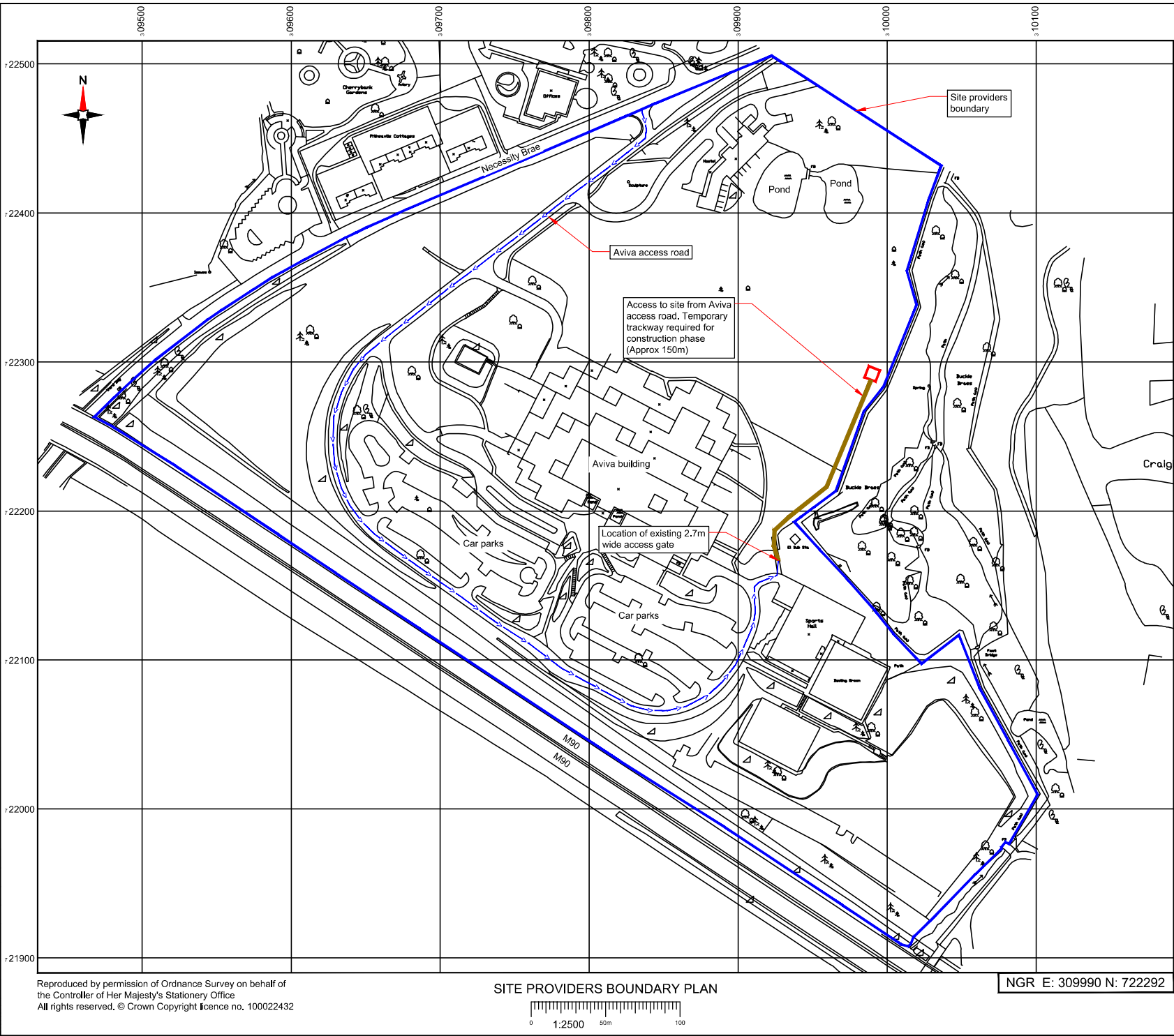
NTQ

Purpose of Issue:

PLANNING

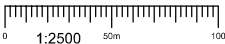
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| EE Call ID:                 | MBNL Call ID: | 3UK Call ID: |
| 33480                       | PAK282        | -            |
| Master Drawing No:          |               |              |
| 1738278_PAK282_33480_-_M002 |               |              |
| Issue:                      |               |              |
| B                           |               |              |





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SITE PROVIDERS BOUNDARY PLAN



NOTES:  
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DIRECTIONS TO SITE:  
Head north-west on M90, Continue to end of Motorway (Junction 12). At the roundabout, take the 3rd exit onto A93. At next roundabout, take the 2nd exit and stay on A93. After 0.9 miles turn right onto Necessity Brae/B9112. After 0.1 miles turn left into Aviva grounds. Follow access road around Aviva building and car parks and through 2.7m wide field gate onto grassed area. Site is accessed across grassed area approx 150m from gate.

Site Providers Boundary: [Diagram showing boundary lines]

Site: [Diagram showing site area]

Access Route To Site: [Diagram showing access route]

Access Route: [Diagram showing access route]

|           |                 |           |               |                   |          |        |   |
|-----------|-----------------|-----------|---------------|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:  | NTQ           | Purpose of Issue: | Planning | Issue: | B |
| M002      | MBNL            |           |               |                   |          |        |   |
| Date:     | 21.01.2025      | Revision: | Tower Change. |                   |          |        |   |
| Drawn:    | JYS             |           |               |                   |          |        |   |
| Checked:  | G.Jennings      |           |               |                   |          |        |   |
| Approved: | G.Jennings      |           |               |                   |          |        |   |

|           |                 |           |              |                   |          |        |   |
|-----------|-----------------|-----------|--------------|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:  | NTQ          | Purpose of Issue: | Planning | Issue: | A |
| M001      | MBNL            |           |              |                   |          |        |   |
| Date:     | 04.12.2024      | Revision: | First Issue. |                   |          |        |   |
| Drawn:    | J.Rossi         |           |              |                   |          |        |   |
| Checked:  | G.Jennings      |           |              |                   |          |        |   |
| Approved: | G.Jennings      |           |              |                   |          |        |   |

Hutchison 3G UK Limited  
Open Hall, 4th Floor, Avenue  
Reading, RG2 0PF  
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Fax: 01202 785 001  
H3G Store Information line  
0844 664333  
Available weekdays Monday to Friday

Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW  
Tel: 01707 315000  
Fax: 01707 315001

**MBNL** Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

**WHP Telecoms**  
Castlevue House,  
Caldor Island Way, Wakefield  
WF2 7AW  
Tel: 01925 424 100  
e-mail: info@whptelecoms.com

Site Name: PITHEAVLIS

Site ID: 1738278

Address: NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title: 002A SITE PROVIDERS BOUNDARY PLAN

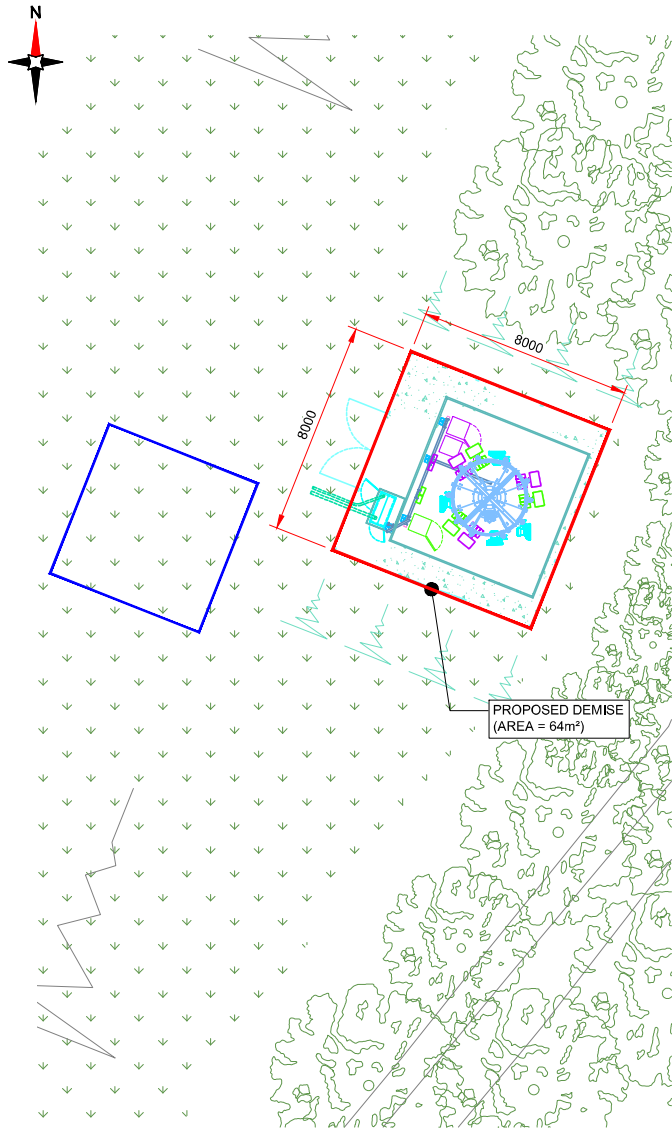
Project: NTQ

Purpose of Issue: PLANNING

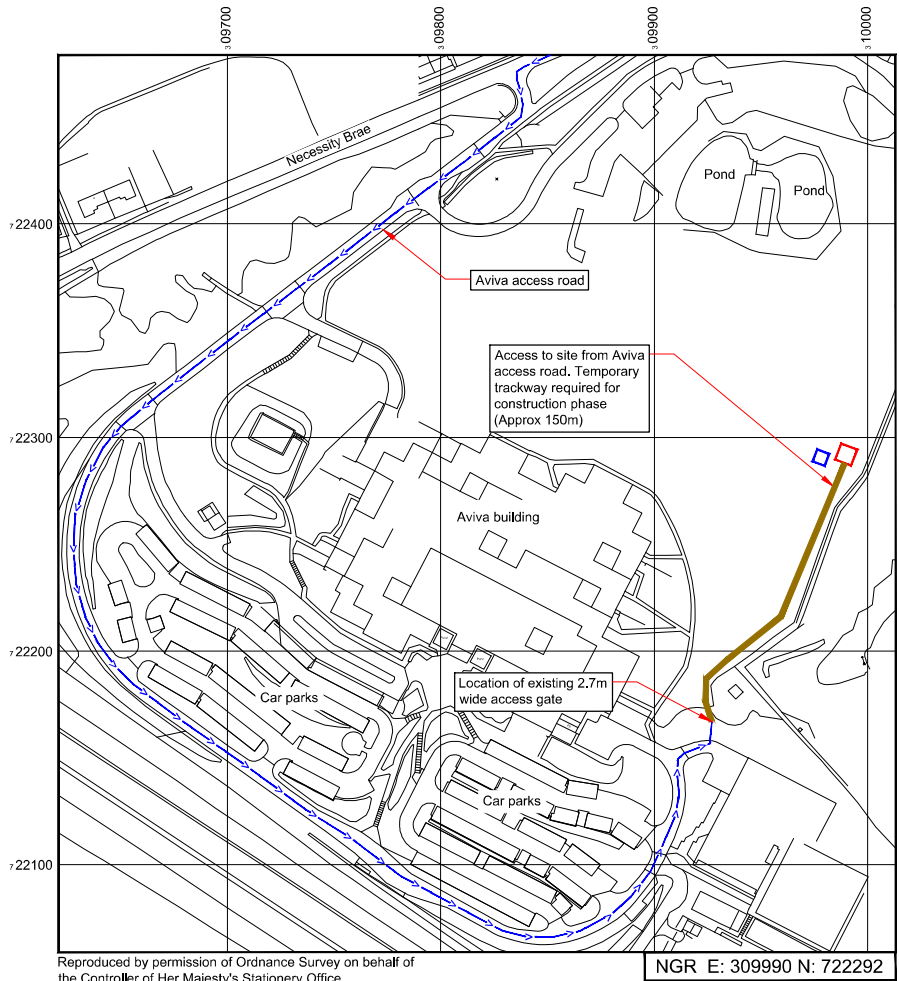
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|-------------|---------------|--------------|
| EE Call ID: | MBNL Call ID: | 3UK Call ID: |
| 33480       | PAK282        | -            |

Master Drawing No: 1738278\_PAK282\_33480\_-\_M002

Issue: B

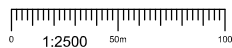


LEASE DEMISE PLAN



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SITE LOCATION PLAN



NGR E: 309990 N: 722292

|                  |                  |  |  |  |
|------------------|------------------|--|--|--|
| <b>NEW CODE:</b> |                  |  |  |  |
| Demise:          | Outlined in Red  |  |  |  |
| Access Route:    | Solid Brown      |  |  |  |
| Set Down Area:   | Outlined in Blue |  |  |  |

|           |                 |                                 |          |                   |          |        |   |
|-----------|-----------------|---------------------------------|----------|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:                        | NTQ      | Purpose of Issue: | Planning | Issue: | B |
| M002      | MBNL            | NTQ                             | Planning | B                 |          |        |   |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |          |                   |          |        |   |
| Drawn:    | JYS             | Tower Change.                   |          |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |          |                   |          |        |   |
| Approved: | G.Jennings      |                                 |          |                   |          |        |   |
| Master:   | MBNL / EE / H3G | Project:                        | NTQ      | Purpose of Issue: | Planning | Issue: | A |
| M001      | MBNL            | NTQ                             | Planning | A                 |          |        |   |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |          |                   |          |        |   |
| Drawn:    | J.Rossi         | First Issue.                    |          |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |          |                   |          |        |   |
| Approved: | G.Jennings      |                                 |          |                   |          |        |   |

Hutchison 3G UK Limited  
Open Top, 400 Corporate Avenue  
Reading, RG2 0AP  
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Fax: 01202 785 001  
H3G State Station Information Ltd  
0404 0043302  
Available Monday to Friday

Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW  
Tel: 01707 315000  
Fax: 01707 315001

Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

**WHP Telecoms**  
Castleview House,  
Caldor Island Way, Wakefield  
WF2 7AW  
Tel: 01925 424 100  
e-mail: info@whptelecoms.com

|                             |               |   |        |
|-----------------------------|---------------|---|--------|
| Site Name:                  |               | PITHEAVLIS  |        |
| Site ID:                    |               | 1738278   |        |
| Address:                    |               | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |        |
| Title:                      |               | 004 LEASE DEMISE  |        |
| Project:                    |               | NTQ   |        |
| Purpose of Issue:           |               | PLANNING  |        |
| EE Call ID:                 | MBNL Call ID: | 3UK Call ID:  |        |
| 33480                       | PAK282        | -   |        |
| Master Drawing No:          |               |   | Issue: |
| 1738278_PAK282_33480_-_M002 |               |   | B      |

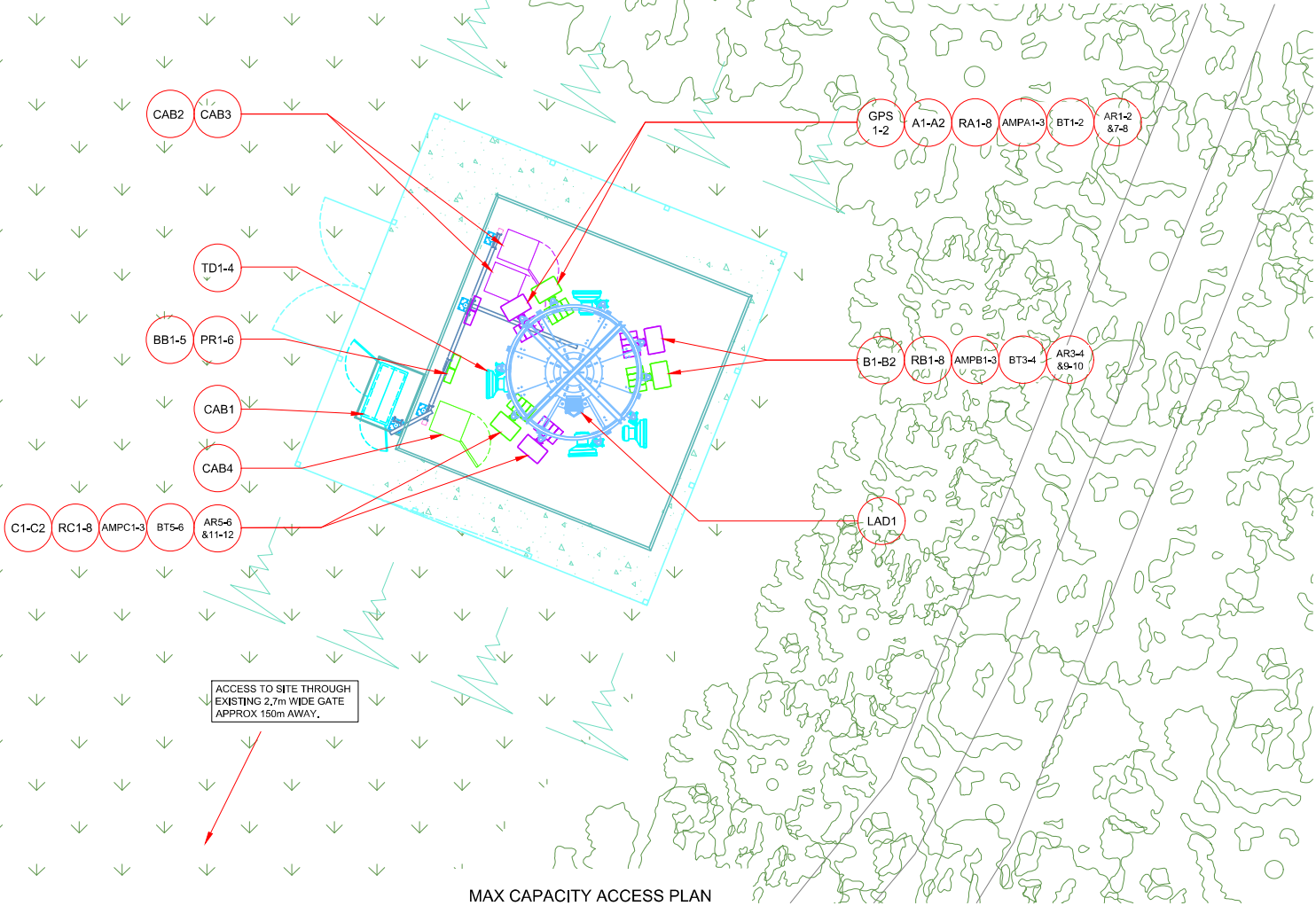


100mm

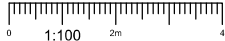
50mm

10mm

| Asset Reference | Asset Description | Asset Status | Antenna / Dish / MHA / RRU / Equipment Access Description | Asset Reference | Asset Description | Asset Status | Antenna / Dish / MHA / RRU / Equipment Access Description |
|-----------------|-------------------|--------------|---|-----------------|-------------------|--------------|---|
| A1-A2           | Antenna           | Proposed     | Rigger access only  | RA1-8           | RRU               | Proposed     | Rigger access only  |
| B1-B2           | Antenna           | Proposed     | Rigger access only  | RB1-8           | RRU               | Proposed     | Rigger access only  |
| C1-C2           | Antenna           | Proposed     | Rigger access only  | RC1-8           | RRU               | Proposed     | Rigger access only  |
| CAB1-4          | Cabinet           | Proposed     | Unrestricted access                                       | AMPA1-3         | MHA               | Proposed     | Rigger access only  |
| TD1             | Dish              | Proposed     | Rigger access only  | AMPB1-3         | MHA               | Proposed     | Rigger access only  |
| TD2             | Dish              | Proposed     | Rigger access only  | AMPC1-3         | MHA               | Proposed     | Rigger access only  |
| TD3             | Dish              | Proposed     | Rigger access only  | BT1-6           | BOB Top           | Proposed     | Rigger access only  |
| TD4             | Dish              | Proposed     | Rigger access only  | BB1-5           | BOB Bottom        | Proposed     | Unrestricted access                                       |
| GPS1-2          | GPS Nodes         | Proposed     | Rigger access only  | AR1-12          | Active Router     | Proposed     | Rigger access only  |
|                 |                   |              |   | PR1-6           | Passive Router    | Proposed     | Unrestricted access                                       |
|                 |                   |              |   | LAD1            | Ladder            | Proposed     | Rigger access only  |



MAX CAPACITY ACCESS PLAN



NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

MAX CONFIGURATION SITE

RF MAX CONFIGS2a

|           |                 |                                 |          |                  |          |       |   |
|-----------|-----------------|---------------------------------|----------|------------------|----------|-------|---|
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Planning | Issue | B |
| M002      | MBNL            | NTQ                             | Planning | B                |          |       |   |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |          |                  |          |       |   |
| Drawn:    | JYS             | Tower Change.                   |          |                  |          |       |   |
| Checked:  | G.Jennings      |                                 |          |                  |          |       |   |
| Approved: | G.Jennings      |                                 |          |                  |          |       |   |
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Planning | Issue | A |
| M001      | MBNL            | NTQ                             | Planning | A                |          |       |   |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |          |                  |          |       |   |
| Drawn:    | J.Rossi         | First Issue.                    |          |                  |          |       |   |
| Checked:  | G.Jennings      |                                 |          |                  |          |       |   |
| Approved: | G.Jennings      |                                 |          |                  |          |       |   |

Hutchison 3G UK Limited  
Sheep Hall, 480 Langford Avenue  
Reading, RG2 6BP  
Tel: 01202 780 000  
Fax: 01202 780 001  
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Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW  
Tel: 01707 315000  
Fax: 01707 319001

Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

WHP Telecoms  
Castletown House,  
Calder Island Way, Wakefield  
WF2 7AW  
Tel: 01925 424 100  
e-mail: info@whptelecoms.com

Site Name:

PITHEAVLIS

Site ID:

1738278

Address:

NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title:

003 ACCESS PLAN

Project:

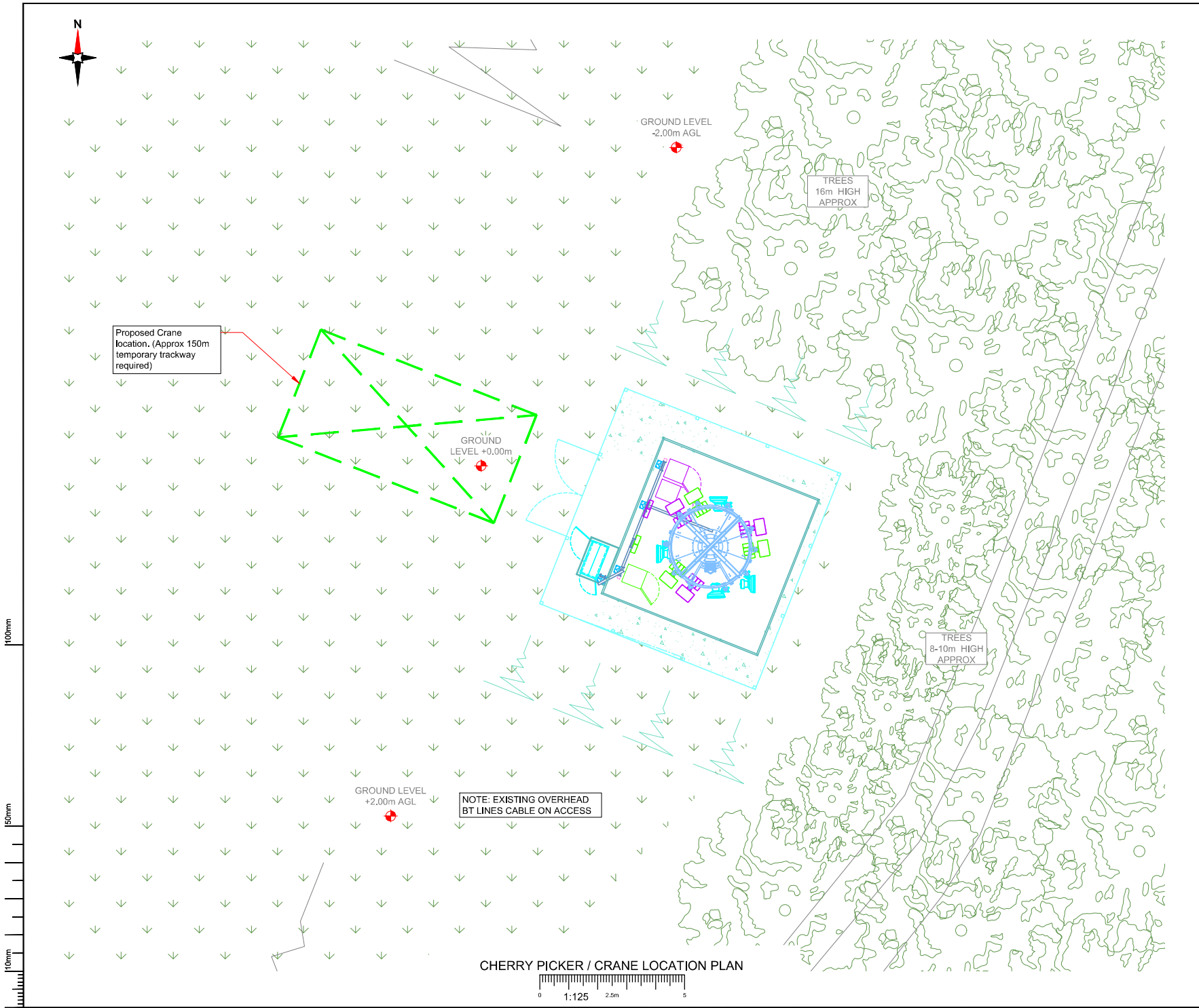
NTQ

Purpose of Issue:

PLANNING

|                    |       |               |        |              |                             |
|--------------------|-------|---------------|--------|--------------|-----------------------------|
| EE Call ID:        | 33480 | MBNL Call ID: | PAK282 | 3UK Call ID: | -                           |
| Master Drawing No: |       |               |        |              | 1738278_PAK282_33480_-_M002 |
| Issue:             |       |               |        |              | B                           |





NOTES:

1. ALL DIMENSIONS IN MM UNLESS OTHERWISE NOTED.

PROPOSED CRANE OR CHERRY PICKER LOCATION:

MAX CONFIGURATION SITE

|               |     |
|---------------|-----|
| RF MAX CONFIG | S2a |
|---------------|-----|

|           |                 |                                 |          |                   |          |        |   |
|-----------|-----------------|---------------------------------|----------|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:                        | NTQ      | Purpose of Issue: | Planning | Issue: | B |
| M002      | MBNL            | NTQ                             | Planning | B                 |          |        |   |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |          |                   |          |        |   |
| Drawn:    | JYS             | Tower Change.                   |          |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |          |                   |          |        |   |
| Approved: | G.Jennings      |                                 |          |                   |          |        |   |
| Master:   | MBNL / EE / H3G | Project:                        | NTQ      | Purpose of Issue: | Planning | Issue: | A |
| M001      | MBNL            | NTQ                             | Planning | A                 |          |        |   |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |          |                   |          |        |   |
| Drawn:    | J.Rossi         | First Issue.                    |          |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |          |                   |          |        |   |
| Approved: | G.Jennings      |                                 |          |                   |          |        |   |

Hutchison 3G UK Limited  
Open Road, 400 Corporate Avenue  
Reading, RG2 6GP  
Tel: 01235 780 000  
Fax: 01235 780 001  
H3G New Station Information Line  
0844 6042432  
Available Monday to Friday

Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW  
Tel: 01707 315000  
Fax: 01707 319001

**MBNL** Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:

**WHP Telecoms**  
Castleview House,  
Caldor Island Way, Wakefield  
WF2 7AW  
Tel: 01925 424 100  
e-mail: info@whptelecoms.com

Site Name:

PITHEAVLIS

Site ID:

1738278

Address:

NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title:

005 CHERRY PICKER & CRANE LOCATION

Project:

NTQ

Purpose of Issue:

PLANNING

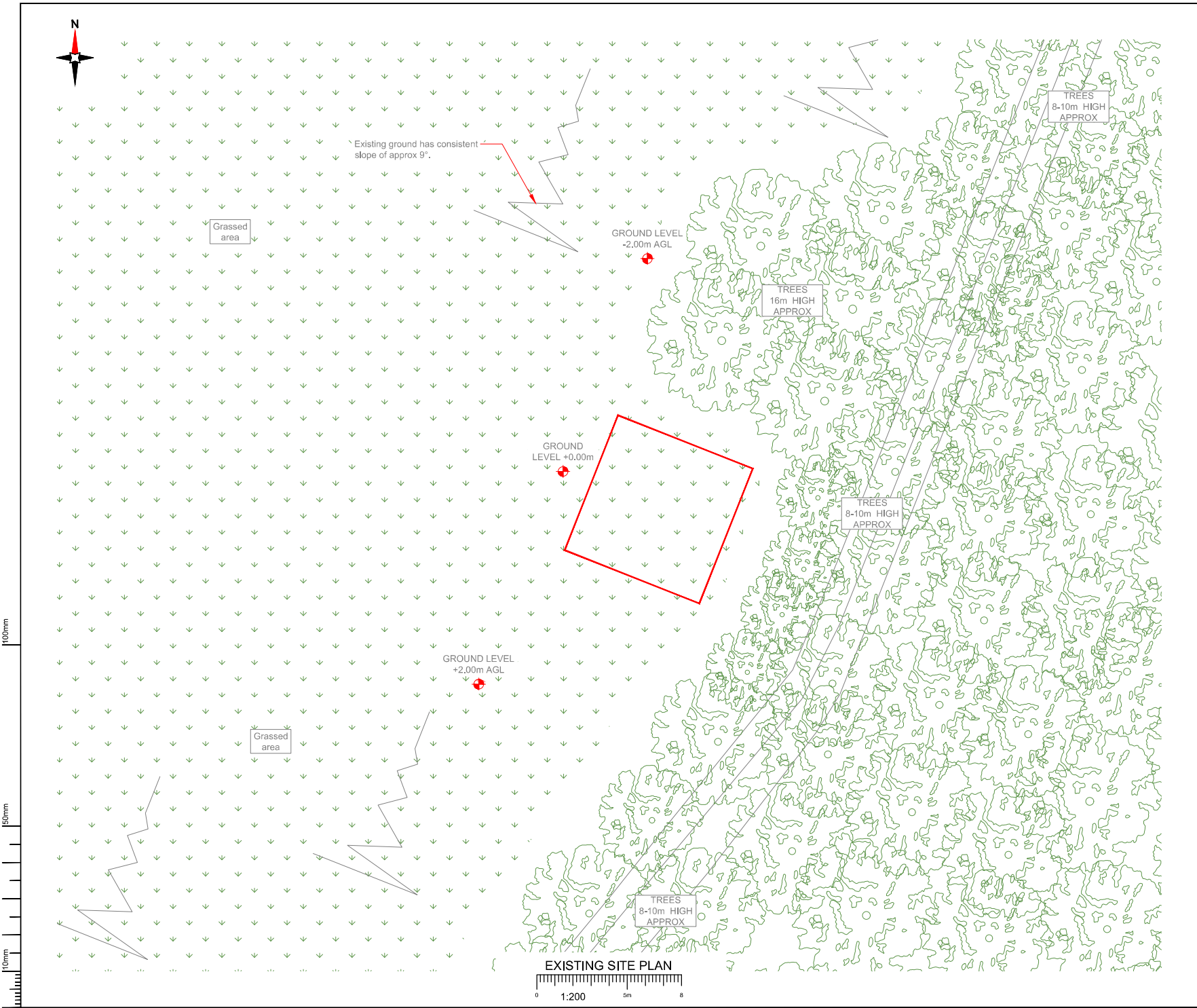
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|-------------|---------------|--------------|
| EE Call ID: | MBNL Call ID: | 3UK Call ID: |
| 33480       | PAK282        | -            |





Master Drawing No:

1738278\_PAK282\_33480\_-\_M002

Issue:

B







|  |                 |   |          |  |
|--|-----------------|---|----------|--|
|  |                 |   |          |  |
|  |                 |   |          |  |
| Master   | MBNL / EE / H3G | Project   |          | Issue  |
| M002   | MBNL            | NTQ   | Planning | B  |
| Date:  | 21.01.2025      | Revision / Upgrade Description:   |          |  |
| Drawn:   | JYS             | Tower Change.   |          |  |
| Checked:   | G.Jennings      |   |          |  |
| Approved:  | G.Jennings      |   |          |  |
| Master   | MBNL / EE / H3G | Project   |          | Issue  |
| M001   | MBNL            | NTQ   | Planning | A  |
| Date:  | 04.12.2024      | Revision / Upgrade Description:   |          |  |
| Drawn:   | J.Rossi         | First Issue.  |          |  |
| Checked:   | G.Jennings      |   |          |  |
| Approved:  | G.Jennings      |   |          |  |
|   |                 |    |          | <p>Hatfield Business Park<br/>Hatfield<br/>Hertfordshire<br/>AL10 9BW</p> <p>Tel: 01707 319000<br/>Fax: 01707 319001</p> |
|   |                 | <p>Mobile Broadband Network Limited<br/>Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX</p>   |          |  |
| Design Consultant & Principal Contractor:  |                 |   |          |  |
|  |                 | <p><b>WHP Telecoms</b><br/>Castletown House,<br/>Calders Island Way, Wakefield<br/>WF2 7AW</p> <p>Tel: 01925 424 100<br/>e-mail: info@whptelecoms.com</p> |          |  |
| Site Name:   |                 |   |          |  |
| PITHEAVLIS   |                 |   |          |  |
| Site ID:   |                 |   |          |  |
| 1738278  |                 |   |          |  |
| Address:   |                 |   |          |  |
| NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND                  |                 |   |          |  |
| Title:   |                 |   |          |  |
| 100 EXISTING SITE PLAN   |                 |   |          |  |
| Project:   |                 |   |          |  |
| NTQ  |                 |   |          |  |
| Purpose of Issue:  |                 |   |          |  |
| PLANNING   |                 |   |          |  |
| EE Call ID:  |                 | MBNL Call ID:   |          | 3UK Call ID:   |
| 33480  |                 | PAK282  |          | -  |
| Master Drawing No:   |                 |   |          | Issue:   |
| 1738278_PAK282_33480_-_M002  |                 |   |          | B  |

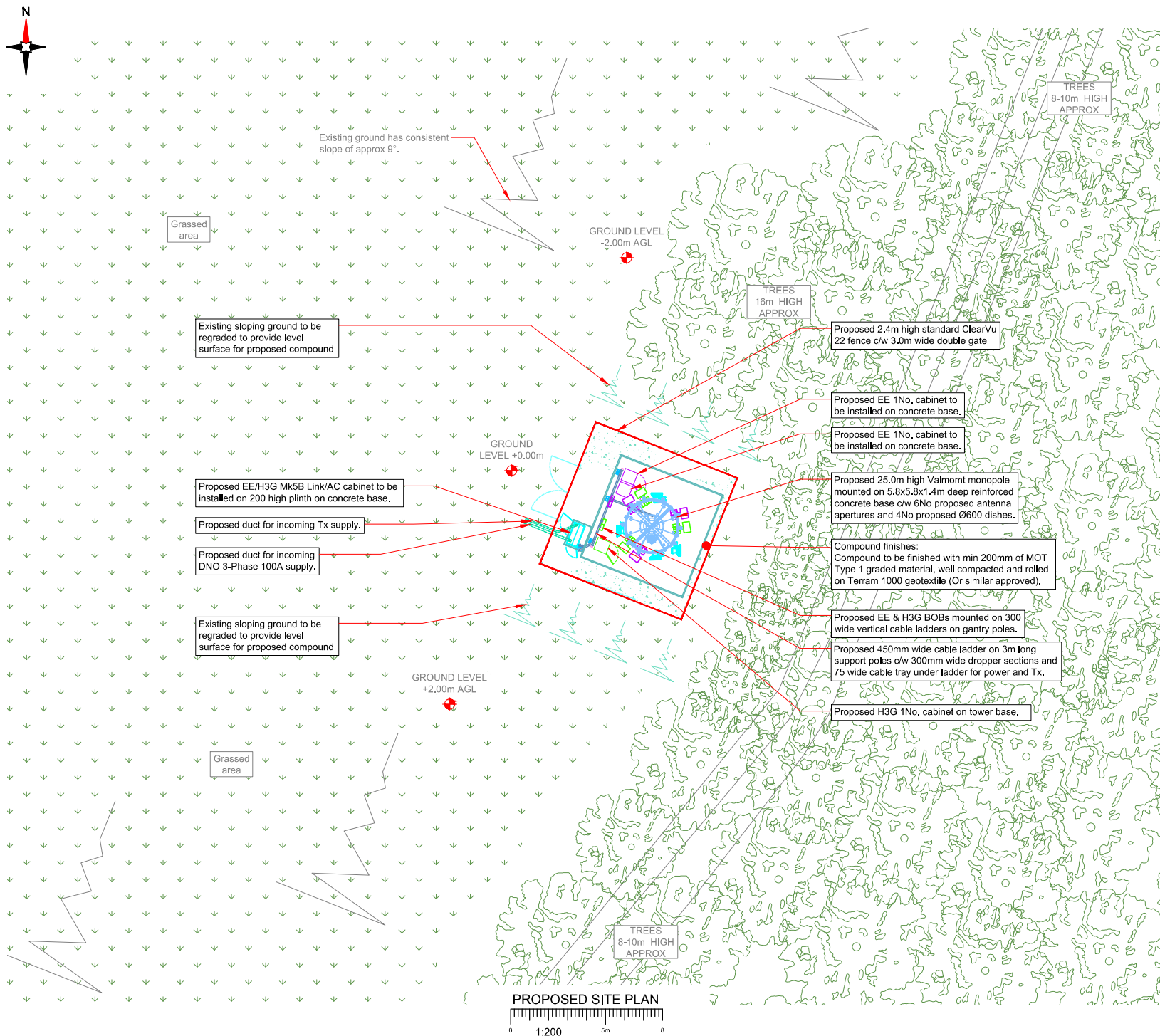
100mm  
50mm  
10mm



EXISTING NW ELEVATION  
0 1:100 2m 4

|   |  |   |  |   |  |   |  |
|---|--|---|--|---|--|---|--|
| Master: MBNL / EE / H3G   |  | Project: NTQ  |  | Purpose of Issue: Planning  |  | Issue: B  |  |
| M002  |  | 21.01.2025  |  | Revision / Upgrade Description: Tower Change.                                       |  |   |  |
| Date: 21.01.2025  |  |   |  |   |  |   |  |
| Drawn: JYS  |  |   |  |   |  |   |  |
| Checked: G.Jennings   |  |   |  |   |  |   |  |
| Approved: G.Jennings  |  |   |  |   |  |   |  |
| Master: MBNL / EE / H3G   |  | Project: NTQ  |  | Purpose of Issue: Planning  |  | Issue: A  |  |
| M001  |  | 04.12.2024  |  | Revision / Upgrade Description: First Issue.  |  |   |  |
| Date: 04.12.2024  |  |   |  |   |  |   |  |
| Drawn: J.Rossi  |  |   |  |   |  |   |  |
| Checked: G.Jennings   |  |   |  |   |  |   |  |
| Approved: G.Jennings  |  |   |  |   |  |   |  |
|    |  | <p>Hutchison 3G UK Limited<br/>One Park, 402 Langston Avenue<br/>Reading, RG2 6BP<br/>Tel: 01235 700 000<br/>Fax: 01235 700 001</p> |  |  |  | <p>Hatfield Business Park<br/>Hatfield<br/>Hertfordshire<br/>AL10 9BW</p> |  |
| <p>3UK Base Station Information File<br/>Call 0843330<br/>Available Monday to Friday</p>  |  |   |  | <p>Tel: 01707 315000<br/>Fax: 01707 319001</p>                                      |  |   |  |
|  Mobile Broadband Network Limited<br>Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX |  |   |  |   |  |   |  |
| Design Consultant & Principal Contractor:   |  |   |  |   |  |   |  |
|   |  | <p>WHP Telecoms<br/>Castlevue House,<br/>Caldor Island Way, Wakefield<br/>WF2 7AW</p>   |  |   |  |   |  |
|   |  | <p>Tel: 01925 424 100<br/>e-mail: info@whptelecoms.com</p>  |  |   |  |   |  |
| Site Name: PITHEAVLIS   |  |   |  |   |  |   |  |
| Site ID: 1738278  |  |   |  |   |  |   |  |
| Address: NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND  |  |   |  |   |  |   |  |
| Title: 150 EXISTING ELEVATION A   |  |   |  |   |  |   |  |
| Project: NTQ  |  |   |  |   |  |   |  |
| Purpose of Issue: PLANNING  |  |   |  |   |  |   |  |
| EE Call ID: 33480   |  | MBNL Call ID: PAK282  |  | 3UK Call ID: -  |  |   |  |
| Master Drawing No: 1738278_PAK282_33480_-_M002  |  |   |  |   |  | Issue: B  |  |





Note: Tower, antennas, RRUs, remote BOBs, GPS nodes and all cabinets to be painted Fir Green (RAL6009)

**MAX CONFIGURATION SITE**

RF MAX CONFIG S2a

|           |                 |                                 |               |                  |          |       |   |
|-----------|-----------------|---------------------------------|---------------|------------------|----------|-------|---|
| Master    | MBNL / EE / H3G | Project                         | NTQ           | Purpose of Issue | Planning | Issue | B |
| M002      | MBNL            | NTQ                             | Planning      |                  |          |       |   |
| Date:     | 21.01.2025      | Revision / Upgrade Description: | Tower Change. |                  |          |       |   |
| Drawn:    | JYS             | Checked:                        | G.Jennings    |                  |          |       |   |
| Approved: | G.Jennings      |                                 |               |                  |          |       |   |
| Master    | MBNL / EE / H3G | Project                         | NTQ           | Purpose of Issue | Planning | Issue | A |
| M001      | MBNL            | NTQ                             | Planning      |                  |          |       |   |
| Date:     | 04.12.2024      | Revision / Upgrade Description: | First Issue.  |                  |          |       |   |
| Drawn:    | J.Rossi         | Checked:                        | G.Jennings    |                  |          |       |   |
| Approved: | G.Jennings      |                                 |               |                  |          |       |   |



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Hatfield  
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Tel: 01707 315000  
Fax: 01707 319001



Mobile Broadband Network Limited  
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Design Consultant & Principal Contractor:



WHP Telecoms  
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WF2 7AW  
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e-mail: info@whptelecoms.com

|                    |   |               |        |
|--------------------|---|---------------|--------|
| Site Name:         | PITHEAVLIS  |               |        |
| Site ID:           | 1738278   |               |        |
| Address:           | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |               |        |
| Title:             | 200 PROPOSED SHARED SITE PLAN                                       |               |        |
| Project:           | NTQ   |               |        |
| Purpose of Issue:  | PLANNING  |               |        |
| EE Call ID:        | 33480   | MBNL Call ID: | PAK282 |
| 3UK Call ID:       | -   |               |        |
| Master Drawing No: | 1738278_PAK282_33480_-_M002   |               |        |
| Issue:             | B   |               |        |

TOP OF PROPOSED TOWER +25.00m AGL

C/L OF PROPOSED ANTENNAS +23.90m AGL

C/L OF PROPOSED DISHES +21.00m AGL

Proposed H3G GPS module to be installed on aperture support pole.

Proposed EE GPS module to be installed on aperture support pole.

Proposed 25.0m high Valmont monopole mounted on 5.8x5.8x1.4m deep reinforced concrete base c/w 6No proposed antenna apertures and 4No proposed Ø600 dishes.

Proposed RRUs, AND BOBs to be fixed to support poles below antennas.

TREES UPTO 16m HIGH APPROX

TREES 8-10m HIGH APPROX

Proposed compound (8m x 8m) from 2.4m high standard ClearVu 22 fence c/w 3.0m wide double gate, Proposed 2No EE, 1No H3G and 1No shared Mk5B Link/AC cabinets and overhead cable management within compound.

+2.0m AGL

GROUND LEVEL

Existing sloping ground to be reggraded to provide level surface for proposed compound

Existing ground has consistent slope of approx 9°.

PROPOSED NW ELEVATION

0 1:100 2m 4

Note: Tower, antennas, RRUs, remote BOBs, GPS nodes and all cabinets to be painted Fir Green (RAL6009)

MAX CONFIGURATION SITE

RF MAX CONFIG S2a

|           |                 |                                 |          |                  |       |
|-----------|-----------------|---------------------------------|----------|------------------|-------|
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Issue |
| M002      | MBNL            | NTQ                             | Planning | B                |       |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |          |                  |       |
| Drawn:    | IYS             | Tower Change.                   |          |                  |       |
| Checked:  | G.Jennings      |                                 |          |                  |       |
| Approved: | G.Jennings      |                                 |          |                  |       |
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Issue |
| M001      | MBNL            | NTQ                             | Planning | A                |       |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |          |                  |       |
| Drawn:    | J.Rossi         | First Issue.                    |          |                  |       |
| Checked:  | G.Jennings      |                                 |          |                  |       |
| Approved: | G.Jennings      |                                 |          |                  |       |



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Fax: 01202 785 001



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AL10 9BW  
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Design Consultant & Principal Contractor:



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|                             |       |   |        |
|-----------------------------|-------|---|--------|
| Site Name:                  |       | PITHEAVLIS  |        |
| Site ID:                    |       | 1738278   |        |
| Address:                    |       | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |        |
| Title:                      |       | 250 PROPOSED NW ELEVATION   |        |
| Project:                    |       | NTQ   |        |
| Purpose of Issue:           |       | PLANNING  |        |
| EE Cat ID:                  | 33480 | MBNL Cat ID:  | PAK282 |
|                             |       | 3UK Cat ID:   | -      |
| Master Drawing No:          |       |   | Issue: |
| 1738278_PAK282_33480_-_M002 |       |   | B      |



TOP OF PROPOSED TOWER +25.00m AGL

C/L OF PROPOSED ANTENNAS +23.90m AGL

C/L OF PROPOSED DISHES +21.00m AGL

Proposed H3G GPS module to be installed on aperture support pole.

Proposed EE GPS module to be installed on aperture support pole.

Proposed 25.0m high Valmont monopole mounted on 5.8x5.8x1.4m deep reinforced concrete base c/w 6No proposed antenna apertures and 4No proposed Ø600 dishes.

Proposed RRUs, AND BOBs to be fixed to support poles below antennas.

TREES UPTO 16m HIGH APPROX

TREES 8-10m HIGH APPROX

Proposed compound (8m x 8m) from 2.4m high standard ClearVu 22 fence c/w 3.0m wide double gate, Proposed 2No EE, 1No H3G and 1No shared Mk5B Link/AC cabinets and overhead cable management within compound.

GROUND LEVEL

Existing sloping ground to be regraded to provide level surface for proposed compound

PROPOSED NE ELEVATION

0 1:100 2m 4

Note: Tower, antennas, RRUs, remote BOBs, GPS nodes and all cabinets to be painted Fir Green (RAL6009)

MAX CONFIGURATION SITE

RF MAX CONFIG S2a

| Master    | MBNL / EE / H3G | Project                         | Purpose of Issue | Issue |
|-----------|-----------------|---------------------------------|------------------|-------|
| M002      | MBNL            | NTQ                             | Planning         | B     |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |                  |       |
| Drawn:    | IYS             | Tower Change.                   |                  |       |
| Checked:  | G.Jennings      |                                 |                  |       |
| Approved: | G.Jennings      |                                 |                  |       |
| Master    | MBNL / EE / H3G | Project                         | Purpose of Issue | Issue |
| M001      | MBNL            | NTQ                             | Planning         | A     |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |                  |       |
| Drawn:    | J.Rossi         | First Issue.                    |                  |       |
| Checked:  | G.Jennings      |                                 |                  |       |
| Approved: | G.Jennings      |                                 |                  |       |



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Fax: 01202 785 001  
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Hartfield Business Park  
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Hertfordshire  
AL10 9BW  
Tel: 01707 315000  
Fax: 01707 315001



Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

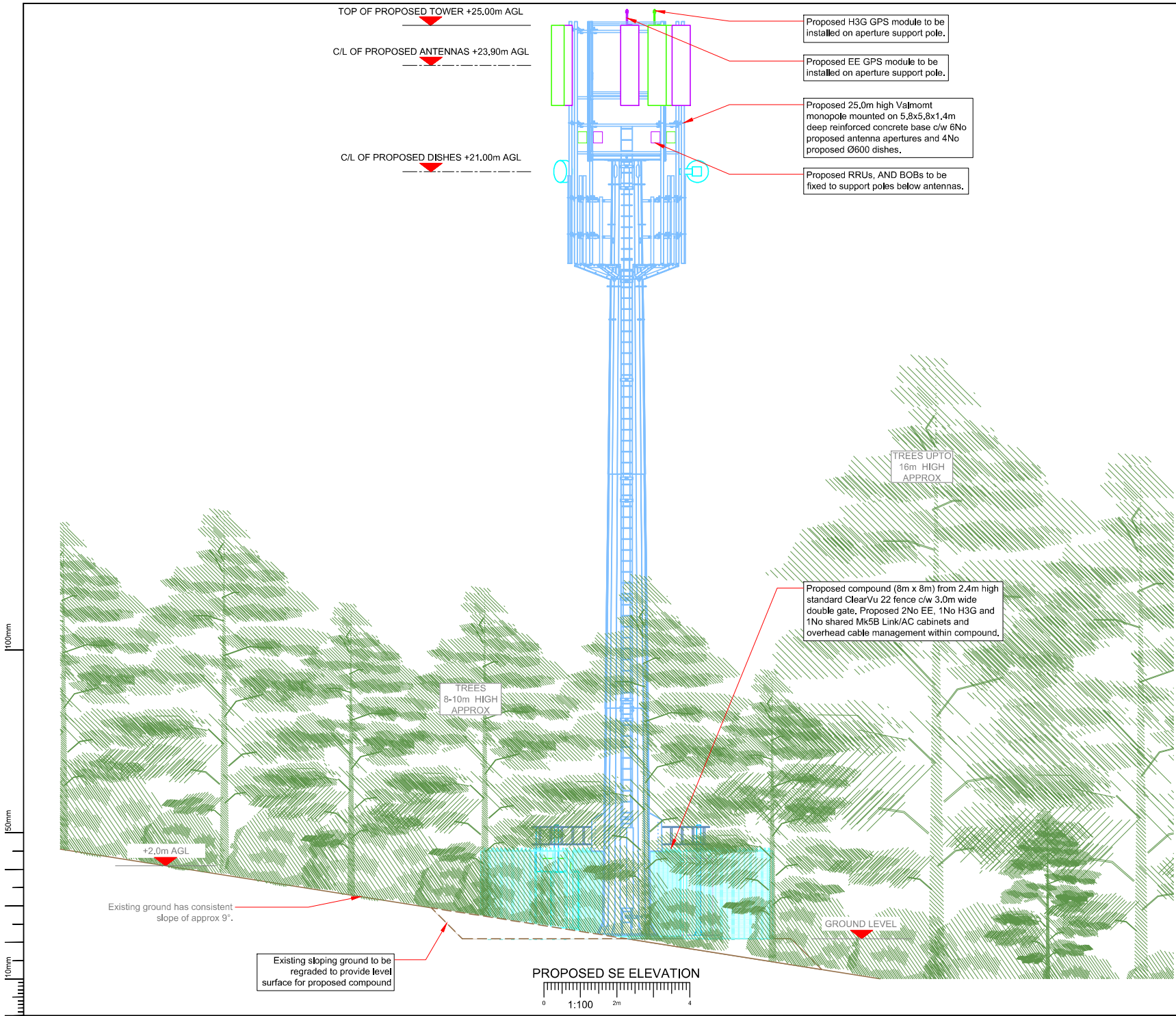
Design Consultant & Principal Contractor:



WHP Telecoms  
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Caldar Island Way, Wakefield  
WF2 7AW  
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e-mail: info@whptelecoms.com

|                    |   |               |        |
|--------------------|---|---------------|--------|
| Site Name:         | PITHEAVLIS  |               |        |
| Site ID:           | 1738278   |               |        |
| Address:           | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |               |        |
| Title:             | 251 PROPOSED NE ELEVATION   |               |        |
| Project:           | NTQ   |               |        |
| Purpose of Issue:  | PLANNING  |               |        |
| EE Call ID:        | 33480   | MBNL Call ID: | PAK282 |
| 3UK Call ID:       | -   |               |        |
| Master Drawing No: | 1738278_PAK282_33480_-_M002   |               |        |
| Issue:             | B   |               |        |





Note: Tower, antennas, RRUs, remote BOBs, GPS nodes and all cabinets to be painted Fir Green (RAL6009)

MAX CONFIGURATION SITE

RF MAX CONFIG S2a

|           |                 |                                 |          |                  |       |
|-----------|-----------------|---------------------------------|----------|------------------|-------|
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Issue |
| M002      | MBNL            | NTQ                             | Planning | B                |       |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |          |                  |       |
| Drawn:    | JYS             | Tower Change.                   |          |                  |       |
| Checked:  | G.Jennings      |                                 |          |                  |       |
| Approved: | G.Jennings      |                                 |          |                  |       |
| Master    | MBNL / EE / H3G | Project                         | NTQ      | Purpose of Issue | Issue |
| M001      | MBNL            | NTQ                             | Planning | A                |       |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |          |                  |       |
| Drawn:    | J.Rossi         | First Issue.                    |          |                  |       |
| Checked:  | G.Jennings      |                                 |          |                  |       |
| Approved: | G.Jennings      |                                 |          |                  |       |



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Design Consultant & Principal Contractor:



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|                             |  |               |  |   |  |        |  |
|-----------------------------|--|---------------|--|---|--|--------|--|
| Site Name:                  |  |               |  | PITHEAVLIS  |  |        |  |
| Site ID:                    |  |               |  | 1738278   |  |        |  |
| Address:                    |  |               |  | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |  |        |  |
| Title:                      |  |               |  | 252 PROPOSED SE ELEVATION   |  |        |  |
| Project:                    |  |               |  | NTQ   |  |        |  |
| Purpose of Issue:           |  |               |  | PLANNING  |  |        |  |
| EE Call ID:                 |  | MBNL Call ID: |  | 3UK Call ID:  |  |        |  |
| 33480                       |  | PAK282        |  | -   |  |        |  |
| Master Drawing No:          |  |               |  |   |  | Issue: |  |
| 1738278_PAK282_33480_-_M002 |  |               |  |   |  | B      |  |

TOP OF PROPOSED TOWER +25.00m AGL

C/L OF PROPOSED ANTENNAS +23.90m AGL

C/L OF PROPOSED DISHES +21.00m AGL

Proposed H3G GPS module to be installed on aperture support pole.

Proposed EE GPS module to be installed on aperture support pole.

Proposed 25.0m high Valmont monopole mounted on 5.8x5.8x1.4m deep reinforced concrete base c/w 6No proposed antenna apertures and 4No proposed Ø600 dishes.

Proposed RRU's, AND BOBs to be fixed to support poles below antennas.

TREES UPTO 16m HIGH APPROX

Proposed compound (8m x 8m) from 2.4m high standard ClearVu 22 fence c/w 3.0m wide double gate, Proposed 2No EE, 1No H3G and 1No shared Mk5B Link/AC cabinets and overhead cable management within compound.

TREES 8-10m HIGH APPROX

GROUND LEVEL

PROPOSED SW ELEVATION



Existing sloping ground to be regraded to provide level surface for proposed compound

Note: Tower, antennas, RRU's, remote BOBs, GPS nodes and all cabinets to be painted Fir Green (RAL6009)

MAX CONFIGURATION SITE

RF MAX CONFIG S2a

| Master    | MBNL / EE / H3G | Project                         | Purpose of Issue | Issue |
|-----------|-----------------|---------------------------------|------------------|-------|
| M002      | MBNL            | NTQ                             | Planning         | B     |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |                  |       |
| Drawn:    | JYS             | Tower Change.                   |                  |       |
| Checked:  | G.Jennings      |                                 |                  |       |
| Approved: | G.Jennings      |                                 |                  |       |
| Master    | MBNL / EE / H3G | Project                         | Purpose of Issue | Issue |
| M001      | MBNL            | NTQ                             | Planning         | A     |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |                  |       |
| Drawn:    | J.Rossi         | First Issue.                    |                  |       |
| Checked:  | G.Jennings      |                                 |                  |       |
| Approved: | G.Jennings      |                                 |                  |       |



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Hertfordshire  
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Design Consultant & Principal Contractor:



**WHP Telecoms**  
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|                    |   |               |        |
|--------------------|---|---------------|--------|
| Site Name:         | PITHEAVLIS  |               |        |
| Site ID:           | 1738278   |               |        |
| Address:           | NECESSITY BRAE<br>PERTH<br>PERTH AND KINROSS<br>PH2 0PZ<br>SCOTLAND |               |        |
| Title:             | 253 PROPOSED SW ELEVATION   |               |        |
| Project:           | NTQ   |               |        |
| Purpose of Issue:  | PLANNING  |               |        |
| EE Call ID:        | 33480   | MBNL Call ID: | PAK282 |
| 3UK Call ID:       |   |               | -      |
| Master Drawing No: | 1738278_PAK282_33480_-_M002   |               | Issue: |
|                    |   |               | B      |

| Max Configuration Antenna Aperture Schedule & RF Equipment Capacity |  |                     |                          |                        |                 |                          |                              |           |  |  |             |        |     |   |            |  |   |
|---|--|---------------------|--------------------------|------------------------|-----------------|--------------------------|------------------------------|-----------|--|--|-------------|--------|-----|---|------------|--|---|
| Antenna Aperture ID   | Antenna Aperture Size (Length x Width x Depth) | Aperture Height C/L | Aperture Max Weight (kg) | Proposed 4G/5G Bearing | Tech: 4G/5G/ 2G | Operator: Shared/ EE/H3G | Antenna Aperture Coordinates |           | RRU No.<br><small>Max Size &amp; Weight<br/>L=500mm<br/>W=500mm<br/>D=200mm<br/>Weight=3kg</small> | MHA No.<br><small>Max Size &amp; Weight<br/>L=300mm<br/>W=300mm<br/>D=150mm<br/>Weight=1kg</small> | Main Feeder |        |     | BOB<br><small>Max Size &amp; Weight<br/>(220x400x150mm &amp; 5kg)</small> |            | Active Router No.<br><small>Max Size &amp; Weight<br/>(370x260x150mm &amp; 15kg)</small> | Passive Router No.<br><small>Max Size &amp; Weight<br/>(370x260x150mm &amp; 15kg)</small> |
|   |  |                     |                          |                        |                 |                          | Easings                      | Northings |  |  | Size        | Length | No. | No. Top   | No. Bottom |  |   |
| A1  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 330°                   | 2G/4G/5G        | EE                       | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 1   | 1          | 2  | 0   |
| A2  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 330°                   | 4G/5G           | H3G                      | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 2   | 1          | 2  | 0   |
| B1  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 80°                    | 2G/4G/5G        | EE                       | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 1   | 1          | 2  | 0   |
| B2  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 80°                    | 4G/5G           | H3G                      | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 2   | 1          | 2  | 0   |
| C1  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 220°                   | 2G/4G/5G        | EE                       | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 1   | 1          | 2  | 0   |
| C2  | 2200x500x400mm                                 | 23.90m              | 100kg                    | 220°                   | 4G/5G           | H3G                      | -                            | -         | 4/0  | 0  | Fibre       | 30m    | 0   | 2   | -          | 2  | 0   |

| Passive Infrastructure Equipment Capacity |     |     |
|---|-----|-----|
| A   | B   | C   |
| S2a                                       | S2a | S2a |

STATUS KEY:

Installed:

Existing

Retain:

Existing and to remain

Relocate:

Existing and to be relocated


Remove:

Existing to be removed from site

Proposed:

New on site

|           |                 |                                 |     |                   |          |        |   |
|-----------|-----------------|---------------------------------|-----|-------------------|----------|--------|---|
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | B |
| M002      | MBNL            |                                 | NTQ |                   | Planning |        | B |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | JYS             | Tower Change.                   |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |
| Master:   | MBNL / EE / H3G | Project:                        | NTQ | Purpose of Issue: | Planning | Issue: | A |
| M001      | MBNL            |                                 | NTQ |                   | Planning |        | A |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |     |                   |          |        |   |
| Drawn:    | J.Rossi         | First Issue.                    |     |                   |          |        |   |
| Checked:  | G.Jennings      |                                 |     |                   |          |        |   |
| Approved: | G.Jennings      |                                 |     |                   |          |        |   |



Hutchison 3G UK Limited

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Hatfield

Hertfordshire

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Design Consultant & Principal Contractor:



WHP Telecoms

Castleview House,

Calder Island Way, Wakefield

WF2 7AW

Tel: 01925 424 100

e-mail: info@whptelecoms.com

Site Name:

PITHEAVLIS

Site ID:

1738278

Address:

NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title:

304 PROPOSED MAX CONFIGURATION  
ANTENNA SCHEDULE

Project:

NTQ

Purpose of Issue:

PLANNING

EE Call ID:

33480

MBNL Call ID:

PAK282

3UK Call ID:

-

Master Drawing No:

1738278\_PAK282\_33480\_-\_M002

Issue:

B



| EQUIPMENT SCHEDULE   |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  | STATUS KEY:   |   |
|--|----------|------------------------------|------------------------------|------------------------|------------------------|-------------------|--|----------------------|--------------|--|------------------------|-----------|--|---------------|---|
| Equipment ID   | Quantity | Status                       | Equipment Description / Type | Equipment Manufacturer | Dimensions (W x D x H) | Weight (kg)       | Colour (RAL Colour)                                    | Material             | Location     | Power  | Power cable length (m) | MBNL Ref: | Comments                                       | Installed:    | Existing  |
| CAB1   | 1        | Proposed                     | MK5B LINK AC                 | -                      | 1200x600x1600          | 300kg             | RAL6009  | STEEL                | Ground Level | -  | -                      | -         | On separate concrete base                      | Retain:       | Existing and to remain                              |
| CAB2   | 1        | Proposed                     | EE - AIRO                    | -                      | 700x600x2100           | 85Kg              | RAL6009  | STEEL                | Ground Level | -  | -                      | -         | On tower base                                  | Relocate:     | Existing and to be relocated                        |
| CAB3   | 1        | Proposed                     | EE - M35                     | VERTIV                 | 730x750x1674           | 300kg             | RAL6009  | STEEL                | Ground Level | -  | -                      | -         | On tower base                                  | Remove:       | Existing to be removed from site                    |
| CAB4   | 1        | Proposed                     | H3G - RBS6130                | ERICSSON               | 650x700x950            | 125.0 Kg          | RAL6009  | STEEL                | Ground Level | -  | -                      | -         | On tower base                                  | Proposed:     | New on site   |
| -  | 3        | Proposed                     | Mk2 BOB's                    | -                      | -                      | -                 | RAL6009  | -                    | Support Pole | -  | -                      | -         | EE - NR700/L800 & GL1800/LNR2100               | LOCATION KEY: |   |
| -  | 3        | Proposed                     | Mk2 BOB's                    | -                      | -                      | -                 | RAL7035  | -                    | Gantry pole  | -  | -                      | -         | EE - NR700/L800 & GL1800/LNR2100               | Outdoor:      | Located outside                                     |
| -  | 3        | Proposed                     | ERS 2460                     | ERICSSON               | 398x143x447            | 21kg              | RAL6009  | STEEL                | Support Pole | DC   | -                      | -         | EE - 700/800                                   | Indoor:       | Located within an equipment cabin or equipment room |
| -  | 3        | Proposed                     | ERS 4480                     | ERICSSON               | 398x190x553            | 32kg              | RAL6009  | STEEL                | Support Pole | DC   | -                      | -         | EE - 1800/2100                                 | Internal:     | located inside a cabinet or item of equipment       |
| -  | 1        | Proposed                     | GPS Node                     | -                      | -                      | -                 | RAL6009  | -                    | Antenna Pole | -  | -                      | -         | EE - GPS Node                                  |               |   |
| -  | 3        | Proposed                     | ERS 2262                     | ERICSSON               | 398x143x447            | 21kg              | RAL6009  | STEEL                | Support Pole | DC   | -                      | -         | H3G - 7/800                                    |               |   |
| -  | 3        | Proposed                     | ERS 4480                     | ERICSSON               | 398x190x553            | 32kg              | RAL6009  | STEEL                | Support Pole | DC   | -                      | -         | H3G - 1800/2100                                |               |   |
| -  | 3        | Proposed                     | ERS 4020                     | ERICSSON               | 404x163x495            | 23.5kg            | RAL6009  | STEEL                | Support Pole | DC   | -                      | -         | H3G - 1400                                     |               |   |
| -  | 1        | Proposed                     | LOCAL 11896                  | ICD                    | -                      | -                 | RAL 7035   | STEEL                | Support Pole | -  | -                      | -         | H3G Local DC BOB                               |               |   |
| -  | 1        | Proposed                     | DC BOB 11898                 | ICD                    | -                      | -                 | RAL6009  | STEEL                | Support Pole | -  | -                      | -         | H3G Remote DC BOB                              |               |   |
| -  | 1        | Proposed                     | FIBRE BOB 11899              | ICD                    | -                      | -                 | RAL6009  | STEEL                | Support Pole | -  | -                      | -         | H3G Remote Fibre BOB                           |               |   |
| -  | 1        | Proposed                     | GPS Module                   | -                      | -                      | -                 | RAL6009  | -                    | Antenna Pole | -  | -                      | -         | H3G - GPS Module                               |               |   |
| -  | 1        | Proposed                     | Mk5 Plinth                   | 1 Try                  | 1200x600x200           | 26kg              | RAL9004  | -                    | Mk5          | -  | -                      | -         | SAP:1017699 Cable Mgmt Plinth for Link AC Mk5B |               |   |
| Support Structure Schedule                                       |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Structure ID   | Status   | Equipment Description / Type | Structure Manufacturer       | Height AGL (m)         | Colour (RAL Colour)    | Headframe Details | Foundation / Support Grillage / Host Structure Details | Support Bolt Details | MBNL Ref:    | Comments   |                        |           |  |               |   |
| ST1  | Proposed | Monopole                     | Valmont                      | 25m                    | RAL6009                | -                 | RC base  | -                    | -            | To be installed on bespoke 5.8x5.8x1.4m deep RC base & painted Fir Green RAL6009 |                        |           |  |               |   |
| ST2  | Proposed | Gantry pole                  | Bespoke                      | 3m                     | Galv.                  | -                 | RC base  | -                    | -            | 4No 3.0m high gantry support poles on tower base.                                |                        |           |  |               |   |
| POWER SCHEDULE   |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Supply Status  | Type     | Supplier                     | Supply Type                  | Location               | Comments               |                   |  |                      |              |  |                        |           |  |               |   |
| PROPOSED   | REC      | TBC                          | 3 Phase 100A                 | MK5B LINK/AC CABINET   | -                      |                   |  |                      |              |  |                        |           |  |               |   |
| Site Name: PITHEAVLIS  |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Site ID: 1738278   |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Address: NECESSITY BRAE PERTH PERTH AND KINROSS PH2 0PZ SCOTLAND |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Title: 305 EQUIPMENT SCHEDULE & SUPPORT STRUCTURE DETAILS        |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Project: NTQ   |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Purpose of Issue: PLANNING                                       |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| EE Cell ID: 33480 MBNL Cell ID: PAK282 3UK Cell ID: -            |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |
| Master Drawing No: 1738278_PAK282_33480_-_M002 Issue: B          |          |                              |                              |                        |                        |                   |  |                      |              |  |                        |           |  |               |   |

| TRANSMISSION DISH SCHEDULE |          |             |                     |                  |                 |               |           |          |
|----------------------------|----------|-------------|---------------------|------------------|-----------------|---------------|-----------|----------|
| Dish ID                    | Status   | Size Ø (mm) | Colour (RAL Colour) | Height (C/L) AGL | Bearing (°) EGN | B End Cell ID | Link Ref: | Comments |
| TD1                        | Proposed | 600mm       | RAL6009             | 21.00m           | TBC             | -             | -         |          |
| TD2                        | Proposed | 600mm       | RAL6009             | 21.00m           | TBC             | -             | -         |          |
| TD3                        | Proposed | 600mm       | RAL6009             | 21.00m           | TBC             | -             | -         |          |
| TD4                        | Proposed | 600mm       | RAL6009             | 21.00m           | TBC             | -             | -         |          |

TRANSMISSION DISH STATUS KEY:

Installed: Commissioned/Installed transmission dish.

Planned: Planned transmission dish with Landlords & Planning Consent.

Reserved: Approved transmission dish for future requirement.

Proposed: New transmission dish awaiting Landlords & Planning consent.

Swapped: Existing transmission with Landlords & Planning consent.

|           |                 |                                 |  |                   |   |
|-----------|-----------------|---------------------------------|--|-------------------|---|
| Master:   | MBNL / EE / H3G | Project:                        |  | Purpose of Issue: |   |
| M002      | MBNL            | NTQ                             |  | Planning          | B |
| Date:     | 21.01.2025      | Revision / Upgrade Description: |  |                   |   |
| Drawn:    | IYS             | Tower Change.                   |  |                   |   |
| Checked:  | G.Jennings      |                                 |  |                   |   |
| Approved: | G.Jennings      |                                 |  |                   |   |
| Master:   | MBNL / EE / H3G | Project:                        |  | Purpose of Issue: |   |
| M001      | MBNL            | NTQ                             |  | Planning          | A |
| Date:     | 04.12.2024      | Revision / Upgrade Description: |  |                   |   |
| Drawn:    | J.Rossi         | First Issue.                    |  |                   |   |
| Checked:  | G.Jennings      |                                 |  |                   |   |
| Approved: | G.Jennings      |                                 |  |                   |   |



Hutchison 3G UK Limited  
Green Park, 450 Langston Avenue  
Reading, RG2 6GP  
Tel: 01202 785 000  
Fax: 01202 785 001



Hatfield Business Park  
Hatfield  
Hertfordshire  
AL10 9BW  
  
Tel: 01707 315000  
Fax: 01707 319001



Mobile Broadband Network Limited  
Sixth Floor, Thames Tower, Station Road, Reading, RG1 1LX

Design Consultant & Principal Contractor:



WHP Telecoms  
Castlevue House,  
Calder Island Way, Wakefield  
WF2 7AW  
  
Tel: 01925 424 100  
e-mail: info@whptelecoms.com

Site Name: PITHEAVLIS

Site ID: 1738278

Address: NECESSITY BRAE  
PERTH  
PERTH AND KINROSS  
PH2 0PZ  
SCOTLAND

Title: 320 TRANSMISSION DISH SCHEDULE

Project: NTQ

Purpose of Issue: PLANNING

|  |               |              |
|--|---------------|--------------|
| EE Cell ID:                                    | MBNL Cell ID: | 3UK Cell ID: |
| 33480  | PAK282        | -            |
| Master Drawing No: 1738278_PAK282_33480_-_M002 |               |              |
| Issue: B                                       |               |              |



Pullar House 35 Kinnoull Street Perth PH1 5GD Tel: 01738 475300 Email: [onlineapps@pkc.gov.uk](mailto:onlineapps@pkc.gov.uk)

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100714491-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

## Type of Application

What is this application for? Please select one of the following: \*

- ☒ Application for planning permission (including changes of use and surface mineral working).
- ☐ Application for planning permission in principle.
- ☐ Further application, (including renewal of planning permission, modification, variation or removal of a planning condition etc)
- ☐ Application for Approval of Matters specified in conditions.

## Description of Proposal

Please describe the proposal including any change of use: \* (Max 500 characters)

Proposed telecommunications installation. Proposed 25.0m High Valmont monopole mounted on 5.8 x 5.8 x 1.4m deep reinforced concrete base c/w 6No. proposed Antenna Apertures and 4No. proposed Ø600 Dishes, 2No. GPS Modules, 4 No. Cabinets and associated works. For full details please refer to the enclosed drawings.

Is this a temporary permission? \*

☐ Yes ☒ No

If a change of use is to be included in the proposal has it already taken place?  
(Answer 'No' if there is no change of use.) \*

☐ Yes ☒ No

Has the work already been started and/or completed? \*

☒ No ☐ Yes – Started ☐ Yes - Completed

## Applicant or Agent Details

Are you an applicant or an agent? \* (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

☐ Applicant ☒ Agent



## Agent Details

Please enter Agent details

|   |                         |  |               |
|---|-------------------------|--|---------------|
| Company/Organisation:   | WHP Telecoms Ltd        |  |               |
| Ref. Number:  |                         | You must enter a Building Name or Number, or both: * |               |
| First Name: *   | Guy                     | Building Name:                                       | Station Court |
| Last Name: *  | de Rose                 | Building Number:                                     | 1a            |
| Telephone Number: *   | 07792 756 062           | Address 1 (Street): *                                | Station Road  |
| Extension Number:   |                         | Address 2:   |               |
| Mobile Number:  |                         | Town/City: *   | Guiseley      |
| Fax Number:   |                         | Country: *   | England       |
|   |                         | Postcode: *  | LS20 8EY      |
| Email Address: *  | g.deros@whptelecoms.com |  |               |
| Is the applicant an individual or an organisation/corporate entity? *                                 |                         |  |               |
| <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Organisation/Corporate entity |                         |  |               |

## Applicant Details

Please enter Applicant details

|                      |                                   |  |              |
|----------------------|-----------------------------------|--|--------------|
| Title:               |                                   | You must enter a Building Name or Number, or both: * |              |
| Other Title:         |                                   | Building Name:                                       | Thames Tower |
| First Name: *        |                                   | Building Number:                                     |              |
| Last Name: *         | EE (UK) Ltd & Hutchison 3G UK Ltd | Address 1 (Street): *                                | Station Road |
| Company/Organisation | EE (UK) Ltd & Hutchison 3G UK Ltd | Address 2:   |              |
| Telephone Number: *  | 07792756062                       | Town/City: *   | Reading      |
| Extension Number:    |                                   | Country: *   | UK           |
| Mobile Number:       |                                   | Postcode: *  | RG1 1LX      |
| Fax Number:          |                                   |  |              |
| Email Address: *     | g.deros@whptelecoms.com           |  |              |

## Site Address Details

Planning Authority:

Perth and Kinross Council

Full postal address of the site (including postcode where available):

Address 1:

Address 2:

Address 3:

Address 4:

Address 5:

Town/City/Settlement:

Post Code:

Please identify/describe the location of the site or sites

PITHEAVLIS, NECESSITY BRAE, PERTH, PERTH AND KINROSS, PH2 0PZ

Northing

722292

Easting

309990

## Pre-Application Discussion

Have you discussed your proposal with the planning authority? \*

☐ Yes ☒ No

## Site Area

Please state the site area:

64.00

Please state the measurement type used:

☐ Hectares (ha) ☒ Square Metres (sq.m)

## Existing Use

Please describe the current or most recent use: \* (Max 500 characters)

Open grassland with trees behind

## Access and Parking

Are you proposing a new altered vehicle access to or from a public road? \*

☐ Yes ☒ No

If Yes please describe and show on your drawings the position of any existing. Altered or new access points, highlighting the changes you propose to make. You should also show existing footpaths and note if there will be any impact on these.

|  |  |
|--|--|
| <p>Are you proposing any change to public paths, public rights of way or affecting any public right of access? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes please show on your drawings the position of any affected areas highlighting the changes you propose to make, including arrangements for continuing or alternative public access.</p>   |  |
| <p>How many vehicle parking spaces (garaging and open parking) currently exist on the application Site?</p>  | <div style="border: 1px solid black; padding: 2px 10px;">0</div> |
| <p>How many vehicle parking spaces (garaging and open parking) do you propose on the site (i.e. the Total of existing and any new spaces or a reduced number of spaces)? *</p>   | <div style="border: 1px solid black; padding: 2px 10px;">0</div> |
| <p>Please show on your drawings the position of existing and proposed parking spaces and identify if these are for the use of particular types of vehicles (e.g. parking for disabled people, coaches, HGV vehicles, cycles spaces).</p>   |  |
| <h2 style="margin: 0;">Water Supply and Drainage Arrangements</h2>   |  |
| <p>Will your proposal require new or altered water supply or drainage arrangements? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>  |  |
| <p>Do your proposals make provision for sustainable drainage of surface water?? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br/>(e.g. SUDS arrangements) *</p> <p>Note:-</p> <p>Please include details of SUDS arrangements on your plans</p> <p>Selecting 'No' to the above question means that you could be in breach of Environmental legislation.</p>  |  |
| <p>Are you proposing to connect to the public water supply network? *</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No, using a private water supply</p> <p><input checked="" type="checkbox"/> No connection required</p> <p>If No, using a private water supply, please show on plans the supply and all works needed to provide it (on or off site).</p>  |  |
| <h2 style="margin: 0;">Assessment of Flood Risk</h2>   |  |
| <p>Is the site within an area of known risk of flooding? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know</p> <p>If the site is within an area of known risk of flooding you may need to submit a Flood Risk Assessment before your application can be determined. You may wish to contact your Planning Authority or SEPA for advice on what information may be required.</p> <p>Do you think your proposal may increase the flood risk elsewhere? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know</p> |  |
| <h2 style="margin: 0;">Trees</h2>  |  |
| <p>Are there any trees on or adjacent to the application site? * <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please mark on your drawings any trees, known protected trees and their canopy spread close to the proposal site and indicate if any are to be cut back or felled.</p>   |  |
| <h2 style="margin: 0;">Waste Storage and Collection</h2>   |  |
| <p>Do the plans incorporate areas to store and aid the collection of waste (including recycling)? * <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>  |  |



If Yes or No, please provide further details: \* (Max 500 characters)

No waste or recycling generated

## Residential Units Including Conversion

Does your proposal include new or additional houses and/or flats? \*

☐ Yes ☒ No

## All Types of Non Housing Development – Proposed New Floorspace

Does your proposal alter or create non-residential floorspace? \*

☐ Yes ☒ No

## Schedule 3 Development

Does the proposal involve a form of development listed in Schedule 3 of the Town and Country Planning (Development Management Procedure (Scotland) Regulations 2013 \*

☐ Yes ☒ No ☐ Don't Know

If yes, your proposal will additionally have to be advertised in a newspaper circulating in the area of the development. Your planning authority will do this on your behalf but will charge you a fee. Please check the planning authority's website for advice on the additional fee and add this to your planning fee.

If you are unsure whether your proposal involves a form of development listed in Schedule 3, please check the Help Text and Guidance notes before contacting your planning authority.

## Planning Service Employee/Elected Member Interest

Is the applicant, or the applicant's spouse/partner, either a member of staff within the planning service or an elected member of the planning authority? \*

☐ Yes ☒ No

## Certificates and Notices

CERTIFICATE AND NOTICE UNDER REGULATION 15 – TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (SCOTLAND) REGULATION 2013

One Certificate must be completed and submitted along with the application form. This is most usually Certificate A, Form 1, Certificate B, Certificate C or Certificate E.

Are you/the applicant the sole owner of ALL the land? \*

☐ Yes ☒ No

Is any of the land part of an agricultural holding? \*

☐ Yes ☒ No

Are you able to identify and give appropriate notice to ALL the other owners? \*

☒ Yes ☐ No

## Certificate Required

The following Land Ownership Certificate is required to complete this section of the proposal:

Certificate B

## Land Ownership Certificate

Certificate and Notice under Regulation 15 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

I hereby certify that

(1) - No person other than myself/the applicant was an owner [Note 4] of any part of the land to which the application relates at the beginning of the period of 21 days ending with the date of the accompanying application;

or –

(1) - I have/The Applicant has served notice on every person other than myself/the applicant who, at the beginning of the period of 21 days ending with the date of the accompanying application was owner [Note 4] of any part of the land to which the application relates.

Name:

Address:

Aviva Insurance LimitedAviva Insurance Limited, Pitheavlis, Perth, Scotland, PH2 0NH

Date of Service of Notice: \*

28/05/2025

(2) - None of the land to which the application relates constitutes or forms part of an agricultural holding;

or –

(2) - The land or part of the land to which the application relates constitutes or forms part of an agricultural holding and I have/the applicant has served notice on every person other than myself/himself who, at the beginning of the period of 21 days ending with the date of the accompanying application was an agricultural tenant. These persons are:

Name:

Address:

Date of Service of Notice: \*

Signed: Guy de Rose

On behalf of: EE (UK) Ltd & Hutchison 3G UK Ltd

Date: 28/05/2025

☒ Please tick here to certify this Certificate. \*

## Checklist – Application for Planning Permission

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

Please take a few moments to complete the following checklist in order to ensure that you have provided all the necessary information in support of your application. Failure to submit sufficient information with your application may result in your application being deemed invalid. The planning authority will not start processing your application until it is valid.

a) If this is a further application where there is a variation of conditions attached to a previous consent, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

b) If this is an application for planning permission or planning permission in principle where there is a crown interest in the land, have you provided a statement to that effect? \*

☐ Yes ☐ No ☒ Not applicable to this application

c) If this is an application for planning permission, planning permission in principle or a further application and the application is for development belonging to the categories of national or major development (other than one under Section 42 of the planning Act), have you provided a Pre-Application Consultation Report? \*

☐ Yes ☐ No ☒ Not applicable to this application

Town and Country Planning (Scotland) Act 1997

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013

d) If this is an application for planning permission and the application relates to development belonging to the categories of national or major developments and you do not benefit from exemption under Regulation 13 of The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, have you provided a Design and Access Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

e) If this is an application for planning permission and relates to development belonging to the category of local developments (subject to regulation 13. (2) and (3) of the Development Management Procedure (Scotland) Regulations 2013) have you provided a Design Statement? \*

☐ Yes ☐ No ☒ Not applicable to this application

f) If your application relates to installation of an antenna to be employed in an electronic communication network, have you provided an ICNIRP Declaration? \*

☒ Yes ☐ No ☐ Not applicable to this application

g) If this is an application for planning permission, planning permission in principle, an application for approval of matters specified in conditions or an application for mineral development, have you provided any other plans or drawings as necessary:

- ☒ Site Layout Plan or Block plan.
- ☒ Elevations.
- ☒ Floor plans.
- ☐ Cross sections.
- ☐ Roof plan.
- ☐ Master Plan/Framework Plan.
- ☐ Landscape plan.
- ☒ Photographs and/or photomontages.
- ☐ Other.

If Other, please specify: \* (Max 500 characters)



Provide copies of the following documents if applicable:

A copy of an Environmental Statement. \*

☐ Yes ☒ N/A

A Design Statement or Design and Access Statement. \*

☐ Yes ☒ N/A

A Flood Risk Assessment. \*

☐ Yes ☒ N/A

A Drainage Impact Assessment (including proposals for Sustainable Drainage Systems). \*

☐ Yes ☒ N/A

Drainage/SUDS layout. \*

☐ Yes ☒ N/A

A Transport Assessment or Travel Plan

☐ Yes ☒ N/A

Contaminated Land Assessment. \*

☐ Yes ☒ N/A

Habitat Survey. \*

☐ Yes ☒ N/A

A Processing Agreement. \*

☐ Yes ☒ N/A

Other Statements (please specify). (Max 500 characters)

## Declare – For Application to Planning Authority

I, the applicant/agent certify that this is an application to the planning authority as described in this form. The accompanying Plans/drawings and additional information are provided as a part of this application.

Declaration Name: Mr Guy de Rose

Declaration Date: 28/05/2025

## Fee Exemption Reason

I have arranged to pay my fee directly to my Authority



EE (UK) Ltd & Hutchison 3G UK Ltd  
c/o WHP Telecoms Ltd  
Guy De Rose  
Station Court  
1A Station Road  
Guiseley  
LS20 8EY

Pullar House  
35 Kinnoull Street  
Perth  
PH1 5GD

Date of Notice: **30th July 2025**

## **TOWN AND COUNTRY PLANNING (SCOTLAND) ACT**

Application Reference: **25/00794/FLL**

I am directed by the Planning Authority under the Town and Country Planning (Scotland) Acts currently in force, to **refuse** your application registered on 5th June 2025 for Planning Permission for **Installation of monopole and associated works Land 180 Metres North East Of Aviva Headquarters Pitheavlis Perth PH2 0NH**

**Kristian Smith**  
**Development Management & Building Standards Service Manager**

### **Reasons for Refusal**

1. The proposal, by virtue of its design, materials, scale and siting, would be detrimental to the landscaped garden area, which is an important element of the setting of the category A listed building.

Approval would therefore be contrary to Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which requires planning authorities to have special regard to the desirability of preserving listed buildings and their settings; contrary to Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; and contrary to Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2.

2. The proposal, by virtue of its design, height, scale, siting and materials, would have a detrimental impact on the quality and character of the area, and it would not complement its surroundings.

Approval would therefore be contrary to Policy 14: Design, Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2.

3. The proposal would have a detrimental and unacceptable impact on the setting of a category A listed building and on the quality and character of the area. As such, the proposal fails to minimise its impacts on visual amenity and the natural and built environment.

Approval would therefore be contrary to Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.

### **Justification**

The proposal is not in accordance with the Development Plan and there are no material reasons which justify departing from the Development Plan.

### **Notes**

1. The applicant should be aware that, if they successfully appeal the refusal of this application, a further planning application will be required for development outwith the red site boundary namely the regrading of sloping land around the proposed compound.

**The plans and documents relating to this decision are listed below and are displayed on Perth and Kinross Council's website at [www.pkc.gov.uk](http://www.pkc.gov.uk) "Online Planning Applications" page**

### **Plan Reference**

01  
02  
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## REPORT OF HANDLING

### DELEGATED REPORT

|                        |                       |                     |
|------------------------|-----------------------|---------------------|
| Ref No                 | 25/00794/FLL          |                     |
| Ward No                | P10- Perth City South |                     |
| Due Determination Date | 4th August 2025       |                     |
| Draft Report Date      | 30th July 2025        |                     |
| Report Issued by       | David Rennie          | Date 30th July 2025 |

**PROPOSAL:** Installation of monopole and associated works

**LOCATION:** Land 180 Metres North East Of Aviva Headquarters  
Pitheavlis Perth PH2 0NH

#### SUMMARY:

This report recommends **refusal** of the application as the development is considered to be contrary to the relevant provisions of the Development Plan and there are no material considerations apparent which justify setting aside the Development Plan.

#### BACKGROUND AND DESCRIPTION OF PROPOSAL

Full planning permission is sought for the installation of a mobile phone mast (including a 25-metre-tall monopole with antennas and dishes, ground-based cabinets, fencing and a reinforced concrete base) on land to the northeast of Aviva's headquarters at Pitheavlis, Perth. The Aviva building is a category A listed building (Historic Environment Scotland ref: LB52450).

The submitted drawings include development outwith the application's red site boundary. The proposed site and elevational drawings show that sloping land outwith the red site boundary would need to be regraded to provide a level surface for the proposed compound; this constitutes an engineering operation that requires planning permission. Should the applicant successfully appeal the refusal of this application, a further planning application for development outwith the red site boundary would be required.

#### SITE HISTORY

25/00119/PNT Installation of monopole and associated works 31 March 2025  
Application invalid

## **PRE-APPLICATION CONSULTATION**

In the submitted Site Specific Supplementary Information, it is stated that the applicant has attempted to engage in pre-application dialogue with the Council as Planning Authority. However, there is no record of the applicant submitting a pre-application enquiry via [Pre-application services - Perth & Kinross Council](#), which is unfortunate as it would have allowed the Council to raise concerns about the proposal at an early stage in the process.

## **DEVELOPMENT PLAN**

The Development Plan for the area comprises National Planning Framework 4 (NPF4) and the Perth and Kinross Local Development Plan 2 (2019) (LDP2).

### **National Planning Framework 4**

The National Planning Framework 4 (NPF4) is the Scottish Government's long-term spatial strategy with a comprehensive set of national planning policies. This strategy sets out how to improve people's lives by making sustainable, liveable and productive spaces.

NPF4 was adopted on 13 February 2023. NPF4 has an increased status over previous NPFs and comprises part of the statutory development plan.

The Council's assessment of this application has considered the following policies of NPF4:

Policy 7: Historic Assets and Places

Policy 14: Design, Quality and Place

Policy 24: Digital Infrastructure

### **Perth and Kinross Local Development Plan 2 – Adopted November 2019**

The Local Development Plan 2 (LDP2) is the most recent statement of Council policy and is augmented by Supplementary Guidance.

The principal policies are:

Policy 1A: Placemaking

Policy 1B: Placemaking

Policy 27A: Listed Buildings

Policy 40A: Forestry, Woodland and Trees: Forest and Woodland Strategy

Policy 59: Digital Infrastructure

## **OTHER MATERIAL CONSIDERATIONS**

None

## **CONSULTATION RESPONSES**

### **Historic Environment Scotland (HES)**

HES have raised concerns about the proposal. The following comments are highlighted:

- Our view is the proposal would affect the setting of the Aviva building and we encourage your Council and the applicant to continue to explore alternative locations, if reasonably possible.
- The landscaped garden area to the north of the A-listed Aviva building forms an important element of its setting.
- The sensitive way the building is incorporated into its landscape setting is an important element of its special interest, contributing both to how the building is viewed externally and the high quality of its internal amenity.
- Our view is that it would be a relatively intrusive element within this landscaped area, in views both to and from the A-listed building. Our preference would be to see it located elsewhere.
- The applicant has explored a number of alternative options for siting the monopole. These have all been discounted, but it appears that other alternatives may be available.
- If your Council are satisfied that the Aviva grounds offer the most suitable option, we suggest that the pole is located downhill of the current site, to the north of the evergreen trees shown in the visualisations. This would allow the pole and associated equipment cabinets to be largely screened in views from the building.

### **Conservation Team**

The submitted supporting information states that “the office buildings provide a commercial backdrop for the installation, minimizing its visual impact from various viewpoints around the site,” which appears to acknowledge that the listed building will form a backdrop to the monopole. No assessment is apparent in relation to the potential adverse visual impact resulting from this. Given the height and siting, the proposed development will be clearly visible in the immediate and wider setting. This



would present a significant intrusion, distracting from the listed building as the visual focus, and detracting from the quality of the landscaped grounds.

While alternative sites have been investigated, there is no clear explanation as to why the proposed site is the most appropriate option, given the proximity of the listed building.

The monopole is proposed to be mounted on a 5.8mx5.8m concrete base, with a depth of 1.4m. No information has been provided on the potential impact on adjacent trees or root protection areas, either in the course of development or thereafter.

The proposal is contrary to NPF4 Policy 7 and LDP2 Policy 27A, in that it will affect the setting of a category A listed building, with no appropriate assessment made of the potential visual or physical impact, based on an understanding of the cultural significance of the building and its setting. I therefore object to the proposed development in its current form.

#### **Perth Scone Airport**

No response received.

### **REPRESENTATIONS**

There was one objection to the application which was submitted on behalf of Aviva Central Services UK Ltd who is the landowner (NB: the applicant is EE (UK) Ltd & Hutchison 3G UK Ltd).

The following concerns were raised and are addressed in the appraisal section below:

- Contrary to NPF4 and LDP2 policies
- Impact on setting of listed building
- Due its distance from the existing mast and the difference in height, the proposed mast should not be described as a replacement mast
- Impacts on trees
- Impact on operation of wind turbine

The following concerns were also raised:

- Impacts on the public when they are using the adjacent core path
  - The applicant has submitted the required ICNIRP Certificate which confirms that the proposed mast “is designed to be in full compliance with the requirements of the radio frequency public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection [1] as expressed in EU Council Recommendation 1999/519/EC of 12 July 1999 “on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz)”.
- Alternative sites should not have been discounted and should be considered

- It is for the applicant to consider the suitability of alternative sites. The recommendation to refuse this application is based on the specifics of the proposed site and is not based on assessment of any other sites.

The following points were raised and are civil matters that would need to be resolved between the applicant and the landowners if the applicant successfully appeals the refusal of this application:

- As landowner, Aviva are not willing to enter into a lease agreement with the applicant unless compelled by statute.
- As the access route to the proposed development site is via a shared road, the applicant would need to agree rights to use the road with both landowners.
- The landowners have not given consent for tracks and a set down area that will be required during the construction phase.

#### **Additional Statements Received:**

|  |   |
|--|---|
| Screening Opinion  | EIA Not Required                        |
| Environmental Impact Assessment (EIA):<br>Environmental Report | Not applicable                          |
| Appropriate Assessment under Habitats Regulations              | Habitats Regulations<br>AA Not Required |
| Design Statement or Design and Access Statement                | Not Required                            |
| Report on Impact or Potential Impact eg Flood Risk Assessment  | Not Required                            |

## **APPRAISAL**

Sections 25 and 37 (2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan comprises NPF4 and the Perth and Kinross Local Development Plan 2019. The relevant policy considerations are outlined in the policy section above and are considered in more detail below. In terms of other material considerations, involving considerations of the Council's other approved policies and supplementary guidance, these are discussed below only where relevant.

In this instance, Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 places a duty on planning authorities in determining such an application as this to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

The determining issues in this case are whether; the proposal complies with development plan policy; or if there are any other material considerations which justify a departure from policy.

### **Policy Appraisal**

The provision of digital and mobile communications infrastructure is generally considered to be supportable in principle. Nevertheless, consideration must be given to the specific details of the proposed development, within the context of the application site, and whether it would have an adverse impact on visual amenity, the character and appearance of the place, and the historic environment. Assessment of the proposal against the relevant policies is provided below.

### **Design and Siting**

The proposed mobile phone mast comprises a 25-metre-tall monopole with antennas and dishes attached to the upper section. The proposal also includes ground-based cabinets and equipment. A 2.4-metre-tall fence with gates will form a compound around the mast. All elements will be painted Fir Green.

The mast and compound would sit on a reinforced concrete base measuring 5.8 metres by 5.8 metres by 1.4 metres deep. Outwith the red site boundary, the existing sloping ground would be levelled to form a level surface; this would result in some of the land being raised by almost 1 metre.

### **Historic Environment**

The proposed mast would be sited in the curtilage of Aviva's main building which is a category A listed building.

On the case officer's site visit, it was noted that the listed building's horizontal design and the roof gardens allow it to merge into the hillside when viewed from the northeast. Sloping down from the listed building, the extensive grassed hillside, punctuated by trees and shrubs, is well-maintained and adds to the character and status of the listed building.

The proposed mast would be installed less than 100 metres to the northeast of the listed building. It would sit downhill from the listed building on a sloping area currently laid to grass, with trees and a wooded area to the east. The proposed elevations show that the 25-metre-tall mast would be 9 metres taller than the tallest trees in the adjacent woodland and would be around 15 metres taller than most of the woodland. The height difference can also be seen in the proposed mock-up images submitted as part of the application.

The Statement of Special Interest for the category A listed building states that "the Aviva UK Insurance Building (the former General Accident headquarters) at Pitheavlis on the outskirts of Perth is among the finest of Scotland's commercial office buildings of its period." The listing also highlights that the building was designed to merge into the



hillside and that it sits in an extensive landscaped setting. The full listing can be viewed at [Aviva UK Insurance Building \(former General Accident Fire and Life Assurance Corporation Headquarters\), including landscaped concourse and two metal sculptures to the south, granite sculpture to northwest, excluding power plants to the west, car port and car parking area to the south and former recreation centre to the east, Necessity Brae, Pitheavlis, Perth \(LB52450\)](#)

In their consultation response, Historic Environment Scotland (HES) have also highlighted that the landscaped garden area to the north of the listed building forms an important element of its setting. They have stated that the proposal would affect the setting of the listed building and would be a relatively intrusive element within the landscaped area, in views both to and from the A-listed building. Their preference would be to see the mast located elsewhere.

The importance of the landscaped area to setting to the listed building gives additional weight to protecting the setting of the listed building.

The verticality of the proposed mast would sit in stark contrast to the horizontal design of the listed building. The proposed development would be a visually-intrusive industrial feature that would be detrimental to the pleasant natural character of the landscaped area. Indeed, even just the formation of the level surface and the installation of the ground based apparatus and fencing would be detrimental to the landscaped area. Although it would be installed near woodland, the mast would be a highly prominent visual feature, particularly when viewed from the northwest and southwest. Indeed, due the height of the mast in comparison to the height of the woodland, the woodland would do little to mitigate the detrimental impact of the proposed mast from any direction.

The proposed development would be sited less than 100 metres from the listed building. This proximity to the listed building further exacerbates the impact on the setting of the listed building.

Given the above, the proposal would be detrimental to the landscaped garden area, which is an important element of the setting of the category A listed building. As such, the proposal is contrary to Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which requires planning authorities to have special regard to the desirability of preserving listed buildings and their settings; contrary to Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; and contrary to Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2.

### **Visual Amenity**

Due to its design, height, scale, siting and materials as detailed above, the proposal would be detrimental to the quality and character of the area, and it would not complement its surroundings. As such, the proposal is contrary to Policy 14: Design,

Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2.

### **Digital Infrastructure**

Policy 24 of NPF4 and Policy 59 of LDP2 support the delivery of digital infrastructure provided impacts on visual amenity and the natural and built environment are minimised.

Given the unacceptable impacts on the setting of the listed building and on the quality and character of the area as noted above, the proposal is contrary to Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.

The applicant has stated that the proposed mast is a replacement for an existing mast at Craigie Hill Golf Club and is required because they have been issued with a 'notice to quit' their existing site due to the proposed redevelopment of the golf course. It is highlighted that an application for planning permission in principle (ref: 24/01421/IPM) has been submitted for the redevelopment of the golf course, but has not yet been determined. If that application were to be approved, a further application would be required before development could commence, and it may be some time after that before development physically commences, if at all. Whilst it is appreciated that the future redevelopment of the golf course would likely require the installation of a replacement mast in this area of Perth, this does not give justification for the installation of the proposed mast in an unacceptable location. In addition, there is likely to be an extended time period before the redevelopment of the golf course commences, which should allow the applicant time to gain consent for a replacement mast in an acceptable location.

### **Trees**

The proposal includes the formation of a 1.4m deep concrete base within 3 metres of the canopy of trees. Outwith the red site boundary, regrading of the land around the proposed base would also be required; some of this regrading would be under the canopy of trees. As the trees are a feature of the setting of the listed building, it should be demonstrated that they would not be impacted during any construction works. However, given the reasons for the refusal of the application, it was not proportionate to ask the applicant to undertake a tree survey to determine any impacts on the trees and to determine whether they could be suitably protected during any construction.

### **Operation of Adjacent Wind Turbine**

In the objection, concerns have been raised that the proposed development could result in Aviva's wind turbine being switched off.

Condition 22 of the planning permission for the wind turbine (ref: 22/00390/FLL) states:  
*In the event that the turbine(s) affects radio, television and/or telephone devices and/or reception of these devices within a 20km radius from the boundary of the*

*development site, the turbine(s) shall be disconnected until the problem has been investigated and resolved.*

The existence of Condition 22 of 22/00390/FLL is not grounds to refuse the current application. The turbine was operational prior to the submission of the application for the proposed mast. Although it is not mentioned in their 'Site Specific Supplementary Information' supporting document, it is expected that the applicant would have considered the presence of the wind turbine prior to the selection of the proposed site. Indeed, given that Condition 22 of 22/00390/FLL infers the wind turbine could affect devices in a large area, it is expected that the applicant would consider the presence of the wind turbine prior to the installation of any mast in Perth and the surrounding area.

### **Developer Contributions**

The Developer Contributions Guidance is not applicable to this application and therefore no contributions are required in this instance.

### **Economic Impact**

The economic impact of the proposal is likely to be minimal and may be limited to the construction phase of the development.

## **PLANNING OBLIGATIONS AND LEGAL AGREEMENTS**

None required.

## **DIRECTION BY SCOTTISH MINISTERS**

None applicable to this proposal.

## **CONCLUSION AND REASONS FOR DECISION**

To conclude, the application must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this respect, the proposal is considered to be contrary to the Development Plan. Account has been taken of the relevant material considerations and none has been found that would justify overriding the Development Plan.

Accordingly, the proposal is refused on the grounds identified below.



## **Reasons for Refusal**

1. The proposal, by virtue of its design, materials, scale and siting, would be detrimental to the landscaped garden area, which is an important element of the setting of the category A listed building.

Approval would therefore be contrary to Section 59 of Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997, which requires planning authorities to have special regard to the desirability of preserving listed buildings and their settings; contrary to Policy 7(c): Historic Assets and Places (Listed Buildings) of National Planning Framework 4; and contrary to Policy 27A: Listed Buildings of the Perth and Kinross Local Development Plan 2.

2. The proposal, by virtue of its design, height, scale, siting and materials, would have a detrimental impact on the quality and character of the area, and it would not complement its surroundings.

Approval would therefore be contrary to Policy 14: Design, Quality and Place of National Planning Framework 4; and contrary to Policies 1A and 1B(c): Placemaking of the Perth and Kinross Local Development Plan 2.

3. The proposal would have a detrimental and unacceptable impact on the setting of a category A listed building and on the quality and character of the area. As such, the proposal fails to minimise its impacts on visual amenity and the natural and built environment.

Approval would therefore be contrary to Policy 24(e): Digital Infrastructure of National Planning Framework 4; and contrary to Policy 59: Digital Infrastructure of the Perth and Kinross Local Development Plan 2.

## **Justification**

The proposal is not in accordance with the Development Plan and there are no material reasons which justify departing from the Development Plan.

## **Informatives**

- 1 The applicant should be aware that, if they successfully appeal the refusal of this application, a further planning application will be required for development outwith the red site boundary namely the regrading of sloping land around the proposed compound.

## **Procedural Notes**

Not Applicable.

## **PLANS AND DOCUMENTS RELATING TO THIS DECISION**

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