



Item 6

25th November 2025

Planning Services 231 George Street GLASGOW G1 1RX Tel: 0141 287 8555 Email: onlineplanning@glasgow.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 100730056-001

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.

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

Ref. Number:

You must enter a Building Name or Number, or both: *

First Name: *

Hannah

Building Name:

New Lanarkshire House

Last Name: *

Morrison

Building Number:

Telephone Number: *

Address 1
(Street): *

3 Dove Wynd

Extension Number:

Address 2:

Strathclyde Business Park

Mobile Number:

Town/City: *

Bellshill

Fax Number:

Country: *

United Kingdom

Postcode: *

ML4 3AD

Email Address: *

Is the applicant an individual or an organisation/corporate entity? *

☐ Individual ☒ Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:		You must enter a Building Name or Number, or both: *	
Other Title:		Building Name:	Hive 2
First Name: *		Building Number:	
Last Name: *		Address 1 (Street): *	1530 Arlington Business Park
Company/Organisation	Cornerstone	Address 2:	
Telephone Number: *	REDACTED	Town/City: *	Theale
Extension Number:		Country: *	United Kingdom
Mobile Number:	REDACTED	Postcode: *	RG7 4SA
Fax Number:			
Email Address: *	REDACTED		

Site Address Details

Planning Authority:	Glasgow City 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

ROOFTOP OF ICONINC THE BONNIE STUDENT ACCOMMODATION, FORMERLY THE LORNE HOTEL, 923 SAUCHIEHALL STREET, GLASGOW, G3 7TQ

Northing	665960	Easting	257110
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Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: *
(Max 500 characters)

Removal of all existing wall mounted antennas and the existing replica flagpole (accommodating antennas) from the rooftop and installation of a new GRP enclosure on top of the existing plantroom (and coloured to match) to accommodate 6No antennas and ancillary equipment. 4No proposed 0.3m transmission dishes would be face mounted onto the existing plantroom wall. Proposed removal of 3No existing equipment cabinets and installation of 6No replacement cabinets onto existing support frames.

Type of Application

What type of application did you submit to the planning authority? *

- ☒ Application for planning permission (including householder application but excluding application to work minerals).
- ☐ Application for planning permission in principle.
- ☐ Further application.
- ☐ Application for approval of matters specified in conditions.

What does your review relate to? *

- ☒ Refusal Notice.
- ☐ Grant of permission with Conditions imposed.
- ☐ No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: * (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

The proposed upgrade is essential to deliver enhanced 4G capacity and new 5G coverage in this high-demand area. The careful siting and design minimises visual impact, and any limited harm is outweighed by the significant public and operational benefits of improved digital connectivity, in line with local and national policies. See Appeal Statement for full details.

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 the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: * (Max 500 characters)

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. You can attach these documents electronically later in the process: * (Max 500 characters)

Application Form, LPA Neighbour Notification, Full Planning Application Cover Letter, Site Specific Supplementary Information, ICNIRP Declaration with Clarification Letter, Location Plan, Planning Drawings, General Background Information for Telecommunications Development, Health and Mobile Phone Base Stations, Letter to Leaders Supporting Digital Infrastructure, LPA Decision Notice, LPA Officers Report of Handling, Photomontage Report, Crow Road Appeal, Dumbreck Road Appeal, Appeal Statement

Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

25/01332/FUL

What date was the application submitted to the planning authority? *

13/06/2025

What date was the decision issued by the planning authority? *

21/08/2025

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.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. *

☒ Yes ☐ No

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

Can the site be clearly seen from a road or public land? *

☒ Yes ☐ No

Is it possible for the site to be accessed safely and without barriers to entry? *

☒ Yes ☐ No

Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant? *

☒ Yes ☐ No

Have you provided the date and reference number of the application which is the subject of this review? *

☒ Yes ☐ No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? *

☒ Yes ☐ No ☐ N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? *

☒ Yes ☐ No

Note: 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. 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.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review *

☒ Yes ☐ No

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 (if any) from the earlier consent.

Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Miss Hannah Morrison

Declaration Date: 17/10/2025

Payment Details

Online payment: T01775

Payment date: 17/10/2025 12:32:29

Created: 17/10/2025 12:32

WHP Telecoms Ltd

Telecommunication Appeal on behalf of Cornerstone

The appeal is made under section 78 of the Town and Country Planning Act 1990

On

**The rooftop of ICONINC The Bonnie Student Accommodation
Formerly The Lorne Hotel,
923 Sauchiehall Street,
Glasgow,
G3 7TQ**

Appeal Statement

Date: 17th October 2025



Prepared by WHP Ltd
www.whptelecoms.com

Agents Ref: 13276926
LPA Ref: 25/01332/FUL

On behalf of Cornerstone (WHP agents)

Proposed removal of all existing wall mounted antennas and the existing replica flagpole (accommodating antennas) from the rooftop and installation of a new GRP enclosure on top of the existing plantroom (and coloured to match) to accommodate 6No antennas and ancillary equipment. 4No proposed 0.3m transmission dishes would be face mounted onto the existing plantroom wall. The proposal also involves the removal of 3No existing equipment cabinets and installation of 6No replacement equipment cabinets onto the existing freestanding support frames on the rooftop.

Appeal Statement of Case

Contents:

1.0 Introduction

2.0 Background Information

3.0 Procedural Matters

4.0 The Appeal Site / Context

5.0 Public Benefits

6.0 Policy / Guidance Consideration

7.0 Discounted Options

8.0 Conclusions

9.0 Appeal Contents

1.0 Introduction

- 1.1 This appeal is being submitted by WHP Telecoms Limited, the agent acting on behalf of Cornerstone (the Appellant). Glasgow City Council (GCC) is the Local Planning Authority (LPA). The proposed development is required to significantly enhance existing 4G service provision and introduce new 5G capability for both VodafoneThree and VMO2, delivering faster data speeds, increased network capacity, and more reliable connectivity to residents, businesses, and visitors within this high-demand area of Glasgow.
- 1.2 The application sought full planning permission for the upgrade of an existing and established rooftop telecommunications installation to meet current and future network requirements for VodafoneThree and VMO2 customers in the surrounding area. The proposed works comprise the removal of the existing wall-mounted antennas, the existing replica flagpole antenna and 3No equipment cabinets. In their place, a new glass-reinforced plastic (GRP) enclosure would be installed on top of the existing rooftop plant room, designed to fully contain 6No replacement antennas within a discreet and visually integrated shroud. 4No transmission dishes would be mounted to the steelwork associated with the plant room, minimising additional rooftop clutter. The GRP enclosure would be finished in bespoke grey colour to match the existing plant room structure.
- 1.3 The proposed development is positioned on the rooftop of the Iconinc Student Accommodation, formerly the Lorne Hotel at 923 Sauchiehall Street, Glasgow, G3 7TQ. (National Grid Reference (NGR) Easting: 257110 & Northing: 665960).
- 1.4 In the reasons for refusal, as given by the LPA in its decision notice for application 25/01332/FUL on 21st August 2025, it is stated:
1. ***The proposed development was not considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's variance with the Development Plan.***
 2. ***The proposed development is contrary to Policy 7 Historic assets and places; Policy 14 Design, quality and place; and Policy 24 Digital infrastructure and CDP 1 The & SG 1 on Placemaking; CDP 3 & IPG 3 on Economic Development; and CDP 9 Historic Environment & SG 9 on Historic Environment of the Glasgow City Development Plan as specified below, and there is no overriding reason to depart therefrom.***
 3. ***The proposed development, by virtue of its siting, size, scale and design quality, would be a dominant addition to the roofscape that, in visual terms, would enlarge the existing plant room to form an incongruous and prominent massing in a highly visible and historically sensitive location. The proposed development would detract from the visual amenity of the area and result in a significant loss of character to Park Conservation Area and the setting of the Category A listed 901-903 Sauchiehall Street.***
- 1.5 In refusing the application, the Local Planning Authority has given insufficient weight to the extensive work undertaken by the Appellant to ensure that both the choice of site and the proposed design strike an appropriate balance between essential operational network requirements and the objectives of relevant national and local planning policy, including National Planning Framework 4 (NPF4) and the Glasgow City Development Plan. Furthermore, despite multiple attempts by the Appellant and their Agent to engage constructively with the Case Officer during the determination period, there was limited opportunity for meaningful dialogue or collaboration to address concerns prior to the decision being issued.
- 1.6 The justification, reasoning, and decision for the refusal of the application by the LPA are the subject of this appeal.
- 1.7 The Grounds for Appeal are:

- i) The upgrade is essential to improve 4G capacity and introduce 5G services for both VodafoneThree and VMO2, addressing a well-evidenced gap in provision in this high demand area of Glasgow. These public benefits, including enhanced digital connectivity, economic growth, and community resilience, are significant material considerations which weigh strongly in favour of the proposal. Without this proposed upgrade to this existing and established communications site, we do not foresee any alternative options to meet the demand for improved 4G and new 5G coverage in this area of Glasgow.
- ii) The careful siting, scale, and appearance of the proposed rooftop equipment would not cause unacceptable harm to the character and appearance of the Park Conservation Area, the setting nearby listed buildings, or the wider roofscape, and any perceived harm is outweighed by the significant public and operational benefits of the scheme.
- iii) Historic Environment Scotland were consulted as part of the application process and raised no objections to the proposal, recognising that the development would not adversely affect the historic environment.
- iv) This is an existing, long-established rooftop communications site within a densely populated and built up area of Glasgow. The six storey, flat roofed building dates from the 1960's and has recently been converted into student accommodation with illuminated signage. A comprehensive search of possible alternative locations in the area was undertaken and confirmed by the Planning Officer's Delegated Report as "*reasonable*," with the application site deemed "*in principle, suitable*" for the required upgrade.
- v) The design has been carefully refined through pre-application consultation and discussion with Glasgow City Council. The post consultation refinements led to the proposed antenna heights being reduced to the absolute minimum level, while ensuring that they are operationally and technically fit for purpose and meet the necessary ICNIRP compliance requirements. This reduction to the proposed antenna heights allowed the Glass Reinforced Plastic (GRP) enclosure surrounding the antennas to be reduced in height and width. Enclosing the antennas and ancillary equipment inside the GRP enclosure minimises visual impact when compared to the alternative of unshrouded antennas and support poles on the roof. The GRP enclosure has been kept to the minimum dimensions possible and would be coloured to match the existing rooftop plant room to further minimise visual contrast. This design ensures the communications equipment on the roof will be as discreet as operationally possible, while still delivering critical mobile network improvements in the surrounding area.
- vi) Policy guidance recognises that rooftop communications equipment will inevitably have some visual presence. However, the careful design of the proposed GRP enclosure would appear as an integrated and recessive feature when viewed in the context of the existing rooftop plant room and six-storey building and would not materially detract from the character or appearance of the Conservation Area or nearby listed buildings.
- vii) Alternative design approaches suggested by the Council during pre-application stage include a '*creative solution to screening the equipment which incorporates the plant room and displays a high degree of artistic and architectural merit*.' It was suggested by the Planning Officer that the screening for the communications equipment should incorporate the existing rooftop plant room and should appear as a single object that complements and enhances the existing roofscape. Having considered the required location of the proposed telecommunications equipment on the top of the existing rooftop plantroom, it

was considered that a smaller and more simplistic screening design would be more appropriate than a larger screening design extending the entire mass of the plant room, in order to avoid drawing undue attention to the equipment. The Planning Officer's Delegated Report describes the existing plant room as, 'a large and incongruous massing' and we have therefore sought to prevent any unnecessary addition to this massing issue. The design proposed is intentionally simple, using a minimalist GRP enclosure that integrates with the existing plant room while ensuring the equipment operates effectively. Any attempt to introduce decorative or complex screening across the entire footprint of the plant room would result in a much bulkier and more visually intrusive structure, contrary to policy objectives. The proposed design therefore represents the most appropriate balance between visual sensitivity and technical necessity.

- viii) The scheme fully accords with the overarching aims of NPF4 and the Glasgow City Development Plan, delivering high-quality digital infrastructure in a sensitive, design-led manner. Any limited visual effects are outweighed by the compelling technical, social, and economic benefits, and the proposal should therefore be approved.

Statutory and Non-Statutory Consultations

- 1.8 The Council's planning portal confirms that no consultee responses were received, including no objection from Historic Environment Scotland (HES), the statutory advisor on the historic environment. No representations were submitted by other statutory bodies, non-statutory consultees, or members of the public, and no objections were received following LPA's neighbour notification process. In the absence of any heritage objections from HES, the only concerns raised in relation to visual impact and setting stem from the planning officer's own assessment. The Officer's Report states:

The proposed development shown in the Rev F drawings will be a highly visible addition in a historically sensitive location. It will increase the scale and visual impact of the lift/plant overrun on top of the Lorne Hotel. The equipment and its housing will be a prominent and incongruous addition to the conservation area and will adversely impact the setting of the Category A listed building. The proposed development would not be supported in its current form.

While these concerns are noted, it is significant that they are not supported by HES, the statutory body responsible for advising on the historic environment, nor by any third-party representations. Furthermore, the Officer's Report itself acknowledges that the site selection process was robust and that the location is, in principle, suitable for telecommunications infrastructure. The Appellant considers that significant weight should be given to the absence of objection from HES and maintains that the proposed development fully complies with relevant design guidance.

Public Representations

- 1.9 A review of the Council's planning portal confirms that neighbour notification letters were issued to 48 properties as part of the statutory consultation process. No public representations were received in response. The full list of properties notified can be found in Appendix 2.

2.0 Background Information

- 2.1 The proposed site is an existing rooftop telecommunications installation located on top of Iconinc The Bonnie student accommodation, formerly The Lorne Hotel, at 923 Sauchiehall Street, Glasgow, G3 7TQ. The rooftop currently hosts equipment operated by both VodafoneThree and VMO2. In order to deliver enhanced 4G capacity and

introduce new 5G services to the surrounding area, both operators require the deployment of additional and more advanced equipment. As acknowledged by the Case Officer, a comprehensive search of the surrounding area was undertaken prior to submission, and all alternative sites were discounted on planning, technical, and operational grounds, confirming that the existing rooftop remains the only viable location for the required upgrade in this area. The new equipment required to support improved 4G coverage and new 5G coverage for both VMO2 and VodafoneThree is larger and heavier than that currently installed for previous mobile technologies. The existing replica flagpole structure and face-mounted antenna solution cannot accommodate the necessary apparatus for both operators for technical and operational reasons. The antennas required for 4G and 5G coverage are much larger and heavier than previous technologies and will not fit inside a replica flagpole design. The latest equipment also operates at a higher frequency than previous technologies and is more susceptible to signal interference issues meaning that it needs to be located at a higher position on the building to avoid clipping and ICNIRP compliance issues. Consequently, it is not feasible to meet the demand for improved coverage in the area while retaining the existing design, thereby necessitating the development of an alternative design solution that meets the technical requirements of the upgraded infrastructure.



Figure 1: Existing installation which VMO2 and VodafoneThree operate from (Source: Google Streetview May 2024)

- 2.2 To meet their licence obligations and meet the ever increasing demand for next-generation digital communications services, both VodafoneThree and VMO2 must enhance existing 4G provision and introduce new 5G coverage within this high-demand area of Glasgow. As previously mentioned, the current rooftop configuration cannot accommodate the additional equipment required, making a revised design both technically necessary and operationally essential. Upgrading the equipment on the roof of this long established communication site is the most effective way to improve coverage and capacity across the surrounding neighbourhoods, transport corridors, and wider local network. The search for alternative siting options confirmed that no other location could deliver the same technical performance or network continuity while minimising impact on the character and amenity of the area.
- 2.3 The upgraded installation will address rising demand for reliable mobile data services and support the use of internet-enabled devices for residents, businesses, emergency

services, and visitors. Without the proposed upgrade, users in the area will continue to experience reduced service quality. The development will provide high-capacity, reliable connectivity for both 4G and 5G, significantly improving digital infrastructure in the Finnieston and Kelvingrove area.

- 2.4 The planning application was validated by the Local Planning Authority on the 13th of June 2025 (ref. 25/01332/FUL) and subsequently refused on the 21st of August 2025.
- 2.5 This appeal invites the Local Review Body to consider whether the proposed GRP enclosure and associated works on the roof of 923 Sauchiehall Street would result in an unacceptable impact on the Park Conservation Area and adjacent listed building, when weighed against the lack of alternative options available to deliver the latest level of high quality mobile communications services to this area and the significant public benefits the upgrade would deliver, including enhanced connectivity; improved service resilience and support for economic activity.
- 2.6 The operators are severely constrained in identifying alternative options to deliver the much needed upgrade to mobile communications in this area due to the dense urban environment and the lack of buildings with a suitable design to accommodate rooftop communications equipment. As you will be aware, the majority of buildings in the area are residential tenements with pitched roofs, which do not offer a design solution to accommodate the communication equipment required to meet the local demand for improved coverage and capacity. The proposed rooftop site at 923 Sauchiehall Street is therefore the only viable location to deliver the required upgrade.

3.0 Procedural Matters

- 3.1 A formal pre-application consultation meeting was held with Planning Officers from Glasgow City Council on the 30th of October 2024. This formed part of wider discussions relating to several proposed telecommunications upgrades across the city. In relation to this site, the meeting focused on demonstrating that the existing, well-established rooftop location represented the only viable solution within a highly constrained search area. The potential for a less visually intrusive GRP enclosure, colour matched to the newly refurbished rooftop plant room as part of the building's conversion from a hotel to student accommodation, was also explored. Attendees included Planning Officers, representatives from WHP, Cornerstone Planning Managers, and network radio engineers.
- 3.2 Following the meeting, written pre-application feedback was issued by the case officer on the 20th of February 2025 (reference 24/02239/PRE). This highlighted the need for a robust assessment of alternative sites and noted that, while options would be limited by the traditional built form of the area, newer buildings in Finnieston should also be considered and discounted with evidence. The appellant confirmed that these sites were too distant to provide the necessary coverage to the target area, and a comprehensive sequential site search included within the planning submission demonstrated that no suitable alternatives existed.
- 3.3 The site's location within the Park Conservation Area and proximity to listed buildings were discussed in detail. The Planning Officer highlighted that the proposed rooftop installation would be visible in key views but acknowledged that, should it be demonstrated that no alternative sites were viable, the Council may support equipment here subject to a high quality, design led approach. In response to the feedback, the appellant revised the design to further minimise visual impact by significantly reducing the scale and extent of the GRP enclosure and lowering the height of the antennas inside the GRP enclosure to the minimum level technically possible. The revised design aimed to balance technical requirements with sensitivity to the historic environment and formed the basis of the refused application.

- 3.4 As part of early engagement, pre-application correspondence was also sent to key stakeholders including local ward councillors, the local MP, and nearby education facilities on the 28th of February 2025. No responses or objections were received.
- 3.5 A detailed site selection exercise was submitted with the planning application and included in Section 7 of the Appeal Statement and Site Specific Supplementary Information. The LPA raised no objections to the sequential approach taken, describing it as “reasonable” and acknowledging that the site was, *in principle*, suitable for the proposed upgrade. This conclusion contradicts the refusal reason citing conflict with CDP 3 (Economic Development) and IPG 3, which require applicants to demonstrate that their site is the most appropriate solution, a requirement clearly satisfied in this case.
- 3.6 In line with NPF4, the Electronic Communications Code of Practice, and the operators’ licence obligations, a sequential approach to site selection was undertaken, considering:
1. Upgrading existing base stations;
 2. Using existing structures belonging to another operator (mast sharing);
 3. Co-locating on or adjacent to existing telecommunications development;
 4. Installing on an existing building or tall structure.

As demonstrated in the Site Specific Supplementary Information and in this statement below, none of the alternative options were viable due to technical, structural, and locational constraints. The only remaining solution was to upgrade the existing and established rooftop installation.

- 3.7 Given the site’s sensitive location, the appellant sought to maintain open dialogue with the Local Planning Authority throughout the application process. However, despite numerous attempts by the agent to contact the case officer to discuss the proposal during the course of the application, no responses were received.
- 3.8 The proposed development will deliver significantly enhanced 4G and new 5G services to both VMO2 and VodafoneThree customers, increasing capacity and connectivity for local residents, businesses, education providers, emergency services, and visitors in the Finnieston and Kelvingrove areas of Glasgow. These substantial public benefits align with the aims of NPF4 and the Glasgow City Development Plan and should be afforded considerable weight in the planning balance.

4.0 **The Appeal Site / Context:**

- 4.1 The appeal site is the rooftop of the Iconinc Student Accommodation building, formerly The Lorne Hotel, at 923 Sauchiehall Street, Glasgow, G3 7TQ (National Grid Reference: Easting 257110, Northing 665960)
- 4.2 As previously discussed, the proposal follows the operators’ technical requirements and sequential site selection process. The existing telecommunications installation on the rooftop is not operationally or technically capable of supporting the upgraded equipment needed by VodafoneThree and VMO2. Upgrading the site is essential to improve 4G services, introduce 5G, and meet statutory service obligations.
- 4.3 The established rooftop installation is situated within the Park Conservation Area. While the host building is not listed, it is in close proximity to a number of listed buildings. The host building stands at 27.6 metres in height to the top of the existing plant room, making it taller than the adjacent and surrounding buildings. This height advantage reduces the visibility of rooftop apparatus from street level and helps to limit its wider visual impact.



Figure 2: Site Location in relation to Conservation Area (yellow shading) and Heritage Assets (pink shading) (Glasgow City Council Maps 2020)

- 4.4 The site already accommodates a rooftop plant room, and the proposed antennas within a GRP enclosure would be sited on top of this structure. To minimise visual impact within the conservation area, all new equipment will be enclosed within a GRP shrouded enclosure designed to match the colour of the existing plant room rather than the antennas and support structures being visible to the naked eye. The colour treatment was confirmed in consultation with the building's developers, who advised that the plant room would be finished in Pale Grey (NCS Colour Reference 0502-R50B), which the GRP shroud will replicate. The proposed antennas inside the GRP enclosure have been positioned at the lowest technically practicable height to balance operational performance with the need to reduce visibility, while ensuring full compliance with ICNIRP standards.



Figure 3: Existing Site from NW on Sauchiehall Street showing replica flagpole (Google Streetview May 2024)



Figure 4: Existing rooftop plantroom as viewed from East near Westminster Terrace showing existing rooftop plantroom (Google Streetview May 2024)

- 4.5 As demonstrated in the Photomontage Report submitted with the application (Appendix 13), the proposed upgrade has been carefully designed to minimise visual impact and integrate as sensitively as possible with the host building. All new communications equipment, including antennas and radio units will be fully enclosed within a bespoke Glass Reinforced Plastic (GRP) enclosure, which will be colour matched to the rooftop plant room in accordance with details provided by the site developers, who confirmed a Pale Grey finish (NCS Colour Reference 0502-R50B) as part of the building's redevelopment. The proposed GRP enclosure has also been set back from the edges of the plant room as much as technically and operationally possible to further reduce visibility from the surrounding area. This design-led approach ensures the development reads as a cohesive and integrated part of the existing building's overall architectural form rather than as a visually intrusive and incongruous addition.
- 4.6 The proposal also includes the removal of the existing rooftop flagpole (as shown in Figure 3), reducing rooftop clutter and improving the overall visual composition of the building when viewed from surrounding public vantage points. As demonstrated in the Photomontage Report, once complete, the installation will appear as a modest and recessive feature that reads as part of the existing rooftop form. Its scale, massing, and colouring will complement the existing plant room, safeguarding visual amenity and preserving the character of the local townscape.
- 4.7 While some limited localised visual impact is inevitable, this must be considered in the context of the significant public benefits delivered by the proposal, including enhanced 4G capacity and the introduction of 5G services and the lack of alternative solutions available to meet this demand. The Photomontage Report (full report at Appendix 13) demonstrates that from key public viewpoints, the development will remain recessive within the roofscape and visually consistent with existing rooftop infrastructure. Upgrading this established communications site therefore represents the most sustainable and least visually intrusive solution, aligning with national and local policy objectives that support the upgrade and sharing of telecommunications infrastructure.



Figure 5: Existing view and photomontage view from Westminster Terrace



Figure 6: Existing view and photomontage view from Westminster Terrace



Figure 7: Existing view and photomontage view from Sauchiehall Street

- 4.8 The installation is required to significantly improve mobile capacity, coverage, and wireless connectivity for VMO2 and VodafoneThree customers across the Finnieston and Kelvingrove area, addressing a well-evidenced gap in existing provision. Enhanced connectivity is essential not only for residents but also for businesses, education providers, emergency services, and visitors, supporting social and economic activity in accordance with national planning guidance, which encourages local authorities to facilitate the delivery of high-quality digital infrastructure.

Siting

- 4.9 Due to the operators' technical requirements and the lack of suitable alternative sites, VodafoneThree and VMO2 must upgrade the existing location to deliver the required level of service. Significant care has been taken to minimise visual impact while addressing operational constraints within the defined search area. The proposed site remains the only viable solution capable of providing the required level of infrastructure within the target coverage area, and this site-specific need should be afforded substantial weight in the determination of the appeal.
- 4.10 The Case Officer's report acknowledges that a comprehensive sequential site selection process was undertaken and that all alternatives were explored and discounted. Potential sites were ruled out for reasons including insufficient structural capacity,

unacceptable residential visual impact, adverse effects on the setting of listed buildings, non-compliance with technical or operational requirements, and a lack of feasible screening opportunities. The Local Planning Authority did not dispute the conclusions of the site selection process, confirming that the appeal site remains the only realistic and deliverable location.

Appearance

- 4.11 The design of the proposed installation has been carefully developed to ensure it is as visually sensitive as possible while meeting network performance requirements. Feedback received during pre-application discussions directly influenced the scheme, leading to a significant reduction in the overall scale and massing of the original design prior to submission of the formal planning application.
- 4.12 The proposed GRP enclosure represents the most sensitive and appropriate design available for this building. Its appearance closely matches that of the existing rooftop plant room, ensuring architectural consistency while effectively screening the required 4G and 5G technologies. Concealment within replica flagpoles is no longer structurally feasible due to the increased size of antennas. Face mounting the antennas on the existing plant room would not provide the necessary height to allow the 4G and 5G antennas to operate effectively while also complying with ICNIRP guidelines. Mounting the antennas and ancillary equipment on the roof of the existing plant room without GRP screening would have a significantly greater impact on the character and visual amenity of the surrounding area. The GRP enclosure remains the most practical solution to integrate the necessary equipment most effectively.
- 4.13 The height of the enclosure and screened equipment has been kept to the absolute minimum required to achieve operational performance, further reducing potential visual effects on the Conservation Area and nearby listed buildings. As shown in Views 2 and 4 of Appendix 16, the GRP enclosure sits comfortably on the existing roofline and does not dominate the local skyline to any unacceptable level.
- 4.14 The technical and operational requirements of the equipment have dictated a minimalist design approach, developed specifically to integrate with the existing building features. More elaborate or decorative screening options would result in a bulkier and more visually prominent structure, out of keeping with the character of the host building and the surrounding conservation area. The proposed solution strikes an appropriate balance between visual sensitivity and technical functionality, maintaining roofscape character similar to other modern telecommunications sites in conservation areas and preserving the historic environment through its restrained form.

Technical Justification

- 4.15 Digital connectivity facilitates economic growth, something which the Government is keen to progress and promote. 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. Economic modelling indicates that, in the most optimistic case as outlined by the Revolution scenario, digitalisation supported by enhanced 4G and 5G capability could increase Scotland's GDP by up to £17 billion by 2035.
 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.

- 4.16 As stated above, the operator has a requirement to enhance and improve coverage and capacity by way of an upgrade to an existing and established communications installation to deploy apparatus which will provide the enhanced 4G and new 5G technologies to the area. Without the proposal subject of this appeal, VMO2 and VodafoneThree customers in this very busy and densely populated area of Glasgow will be unable to benefit from high quality 4G and 5G coverage and capacity.
- 4.17 It is therefore essential that coverage in this location is improved. Coverage plots provided within this appeal below (and included in the Site Specific Supplementary Information document enclosed alongside the original application) demonstrate the existing and proposed VMO2 4G and 5G service levels, clearly showing the extent of existing and improved provision that will result from the upgrade. As you may be aware, the Mobile Operators are in the process of switching off their existing 3G networks across the UK to reassign the spectrum for use on their 4G and 5G networks. This 3G switch off makes it even more crucial that adequate 4G and 5G coverage is in place to prevent coverage blackspots occurring.
- 4.18 The need for improved coverage at this site is further evidenced by independent data from the Glasgow City Region Mobile Phone Mapping initiative, delivered in partnership with Streetwave.
- 4.19 This publicly accessible tool (glasgowcityregion.co.uk/mobilephonecoverage), developed as part of the Glasgow City Region's designation as a 5G Innovation Region, identifies significant deficiencies across multiple network operators in the surrounding area. It should be noted that this mapping only provides **outdoor** coverage checking results and does not include 'in building' levels of coverage which will be significantly less than the service levels recorded outdoors. The latest set of results shown in the images below define coverage levels in the area as either Good, Acceptable, Essential or Poor (but do not differentiate between 2G, 3G, 4G and 5G coverage).
- 4.20 While the Streetwave results illustrated below in Figures 8, 9 & 10 show small pockets of 'Good' outdoor coverage, the majority of the area for all three Operators only provides an 'Essential' level of outdoor coverage. The proposal subject of this Review aims to bring the level of coverage in this area up to the top level, ensuring local users have full access to all the essential services that high quality mobile communications coverage can provide. The proposal will also result in a massive improvement to indoor mobile communications coverage in the area, which suffers from signal degradation as a result of the dense built urban form in this area.

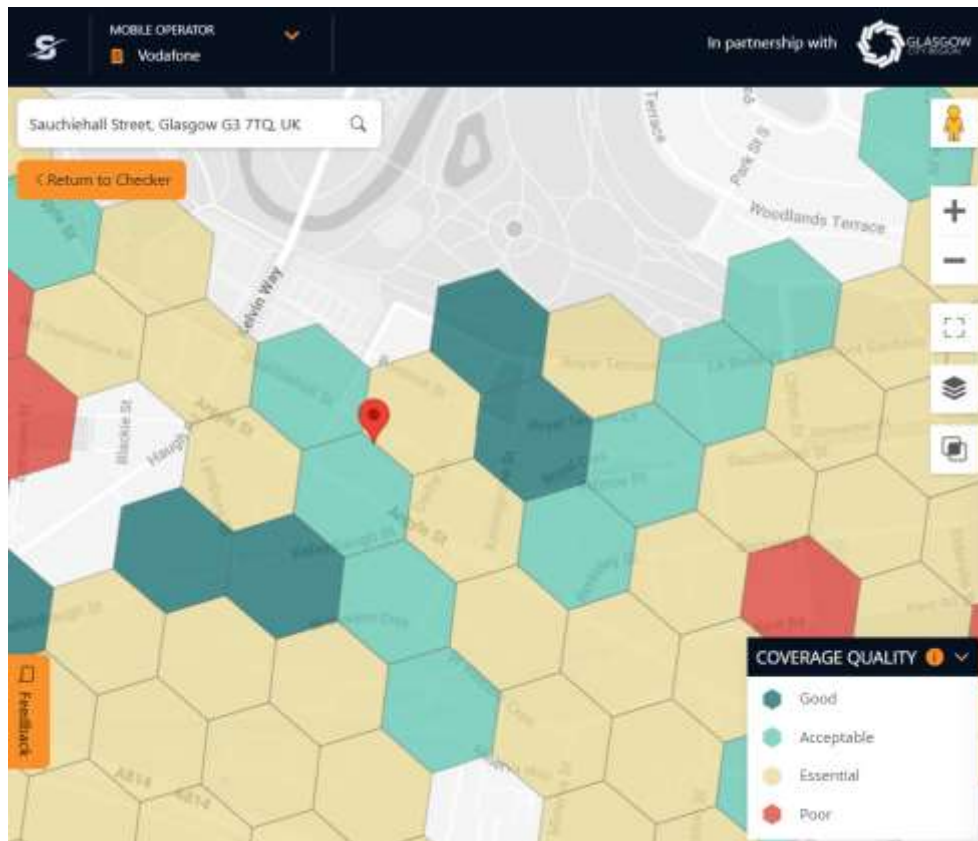


Figure 8: Existing Vodafone coverage in the local area.
(glasgowcityregion.co.uk/mobilephonecoverage)

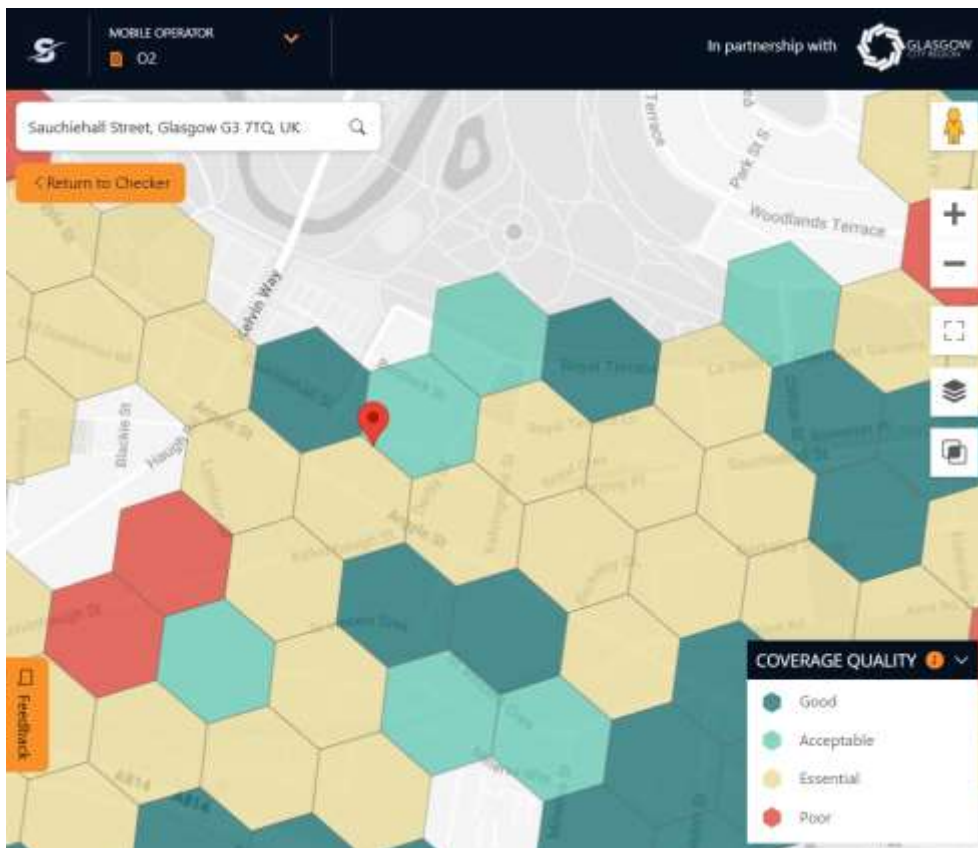


Figure 9: Existing VMO2 coverage in the local area.
(glasgowcityregion.co.uk/mobilephonecoverage)

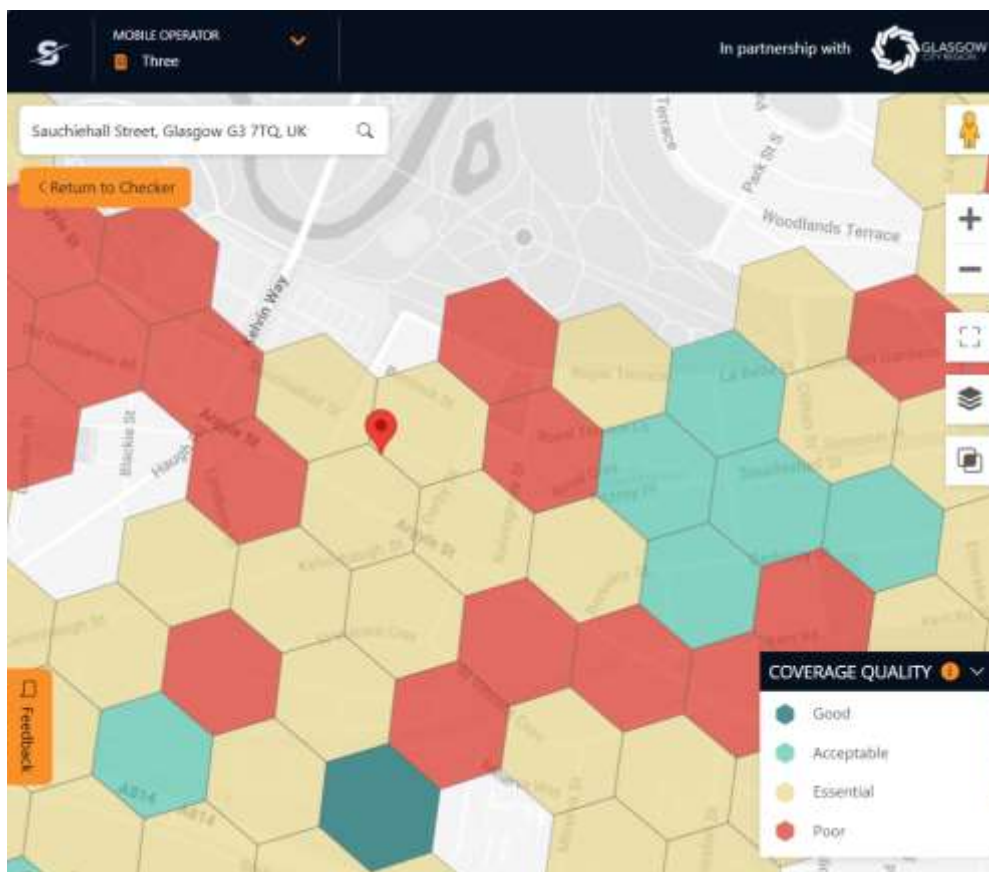


Figure 10: Existing Three coverage in the local area.
(glasgowcityregion.co.uk/mobilephonecoverage)

- 4.21 Delivering improved service in this densely populated area is complicated by several factors, most notably the site's position within the Park Conservation Area and its proximity to listed buildings. These heritage designations necessitate a sensitive approach to siting and design to protect the area's historic character and setting. The proposed installation has therefore been carefully designed and positioned to balance heritage sensitivities with technical performance requirements, elevating the antennas sufficiently to overcome building clutter limitations while minimising visual impact on the Conservation Area and nearby listed buildings.
- 4.22 As can be seen in the existing and proposed Coverage Maps below, the upgrade of this existing communications site will deliver significant improvements to 4G coverage and capacity and provide the latest 5G mobile coverage for residents, businesses, and visitors to this popular area of Glasgow. Figure 11 below highlights the substantial 4G coverage gaps in the area, depicted by the unshaded areas, with the proposed location marked by a red star symbol.

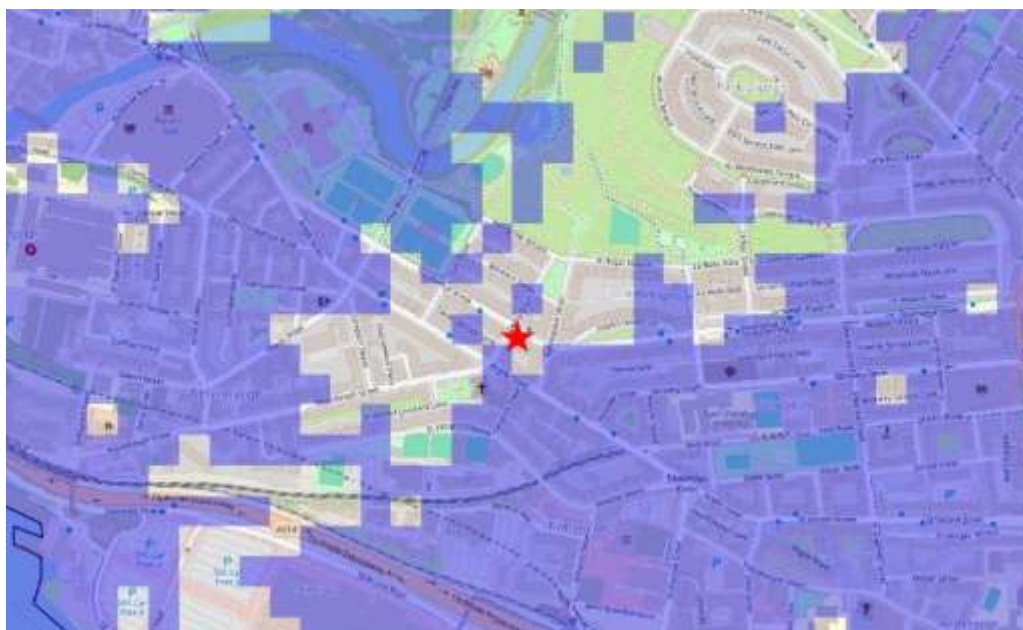


Figure 11: Map showing the existing 4G coverage in the area (shaded blue)



Figure 12: Map showing the proposed 4G coverage in the area (shaded blue)

- 4.23 As illustrated in Figure 12 above, the proposed upgrade of communications equipment on the Iconinc building will deliver a significant uplift of 4G coverage and capacity across the area. Large portions of the ever popular Kelvingrove Park to the north will benefit from near-complete 4G coverage, including the main park area. Additionally, the trainline to the south, which currently experiences only partial signal availability, will see substantial improvements in connectivity when approaching the city centre. The area surrounding the Iconinc student accommodation building will also experience a significant uplift in 4G coverage and capacity, allowing for high quality in-building access to the networks. This includes the full length of key thoroughfares such as Sauchiehall Street, Argyll Street, Kelvinhaugh Street, and St Vincent Crescent. These streets are characterised by high footfall and a diverse mix of uses, including retail and commercial premises at street level with residential flats above. It is important to note that the prevalence of traditional four-storey sandstone tenements in this area often presents challenges to signal propagation. Despite these obstacles, the careful siting of the

proposed equipment will deliver strong and reliable 4G connectivity, representing a considerable improvement to the current network performance.



Figure 13: Map showing the existing 5G coverage in the area (shaded pink)



Figure 14: Map showing the proposed 5G coverage in the area (shaded pink)

- 4.24 As seen in Figures 13 and 14 above, the proposed upgrade will deliver a substantial improvement in 5G mobile coverage across a large area of Glasgow's West End, including Kelvingrove, Sandyford and Finnieston. The development will help to bridge existing coverage gaps and provide new 5G mobile connectivity in previously unserved zones.
- 4.25 Ultimately, the proposed infrastructure will strengthen 4G coverage and introduce 5G coverage, enhance call quality, reduce dropouts, and provide faster, more reliable mobile data services. This improvement is vital not only for everyday communication and digital access, but also for supporting local businesses, home working, and access to online public services.

5.0 **Public Benefits**

- 5.1 The Government's digital strategy makes clear that next-generation mobile infrastructure is central to the UK's economic growth, social inclusion, and resilience. The *Future Telecoms Infrastructure Review* (2018) set a target for the majority of the population to have 5G coverage by 2027, and the revised *Code of Practice* (March 2022) emphasises the need to deliver high-quality wireless networks while balancing environmental considerations. Digital connectivity is now widely regarded as essential infrastructure, comparable to water, electricity, and transport, underpinning economic productivity and social well-being.
- 5.2 The appeal site serves a dense urban area with consistently high footfall along the Sauchiehall Street corridor and adjoining streets within the Kelvingrove and Finnieston areas. This area contains dense residential properties; student accommodation, hotels, cafes, bars, retail, cultural venues, and offices, and it sits on key public transport and traffic routes. Demand for mobile data in the area is therefore sustained and driven by residents, students, commuters, visitors, and the evening economy. The existing rooftop installation cannot meet present or future coverage demands without the upgrade subject of this Review.

6.0 **Policy / Guidance Consideration**

- 6.1 The reasons for refusal as given by the LPA in its decision notice for application 25/01332/FUL on 21 August 2025 are as follows:

1. ***The proposed development was not considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's variance with the Development Plan.***
2. ***The proposed development is contrary to Policy 7 Historic assets and places; Policy 14 Design, quality and place; and Policy 24 Digital infrastructure and CDP 1 The & SG 1 on Placemaking; CDP 3 & IPG 3 on Economic Development; and CDP 9 Historic Environment & SG 9 on Historic Environment of the Glasgow City Development Plan as specified below, and there is no overriding reason to depart therefrom.***
3. ***The proposed development, by virtue of its siting, size, scale and design quality, would be a dominant addition to the roovescape that, in visual terms, would enlarge the existing plant room to form an incongruous and prominent massing in a highly visible and historically sensitive location. The proposed development would detract from the visual amenity of the area and result in a significant loss of character to Park Conservation Area and the setting of the Category A listed 901-903 Sauchiehall Street.***

Principal Considerations

The key issues for determination are whether the siting and appearance of the proposed installation would cause unacceptable harm to the character and appearance of the Park Conservation Area and the setting of the adjacent listed building, and, if any visual harm is identified, whether that is outweighed by the significant public benefits associated with improved digital infrastructure. Consideration must also be given to the absence of any suitable alternative sites.

6.2 **NPF4: Policy 7 Historic Assets and Places and CDP 9 Historic Environment**

- 6.3 It is acknowledged that rooftop telecommunications infrastructure will inevitably have some visual presence. However, the host building is a fairly modern structure in comparison to the majority of surrounding buildings, with a contemporary façade that does not embody the defining historic features of the Conservation Area. This means

that its rooftop is inherently more appropriate for such equipment than a more traditional or architecturally sensitive building nearby.

- 6.4 The proposal has been carefully designed to minimise visual impact. All apparatus will be enclosed within a GRP structure finished to match the existing plant room, reducing perceived scale and ensuring a coherent and unobtrusive appearance. Photomontages demonstrate that the development will integrate with the existing roofscape and will not detract from the character of the Conservation Area or the setting of the listed building.
- 6.5 The officer's conclusion that the scheme would form an "*incongruous massing*" does not reflect the sensitive design approach taken. In reality, the proposal responds appropriately to its context and is consistent with the aims of NPF4's Policy 7 and CDP 9, which seek to balance the protection of heritage assets with the delivery of essential infrastructure.
- 6.6 **NPF4: Policy 14 and CDP 1 Placemaking**
- 6.7 The LPA's view that the proposal should display a higher degree of "*architectural merit*" misunderstands the purpose and context of the installation. A more elaborate design to screen the antennas and ancillary equipment from view would risk appearing discordant with the utilitarian nature of the existing plant room, thereby increasing visual impact and prominence rather than reducing it.
- 6.8 In direct response to pre-application advice, the proposal was refined and its scale reduced to the absolute minimum necessary to meet technical and operational requirements. The choice of materials and finishes was deliberately made to maintain visual coherence. These changes represent a design-led response within the technical constraints of telecommunications infrastructure and align with the objectives of NPF4 Policy 14 and CDP 1.
- 6.9 Furthermore, introducing a screening solution that would incorporate the full footprint of the rooftop plantroom would create a much larger and more conspicuous and distracting rooftop form. The restrained GRP enclosure design, by contrast, respects the established character and avoids creating an incongruous feature within the historic setting.
- 6.10 **NPF4: Policy 24, CDP 3 and IPG 3 Digital Infrastructure and Economic Development**
- 6.11 NPF4 Policy 24 and CDP 3 require that telecommunications equipment be sensitively sited and that the applicant demonstrates that the location is justified. The LPA's own assessment concluded that the site selection process and supporting justification were reasonable. A comprehensive sequential site search was undertaken and fully documented, assessing a range of alternative rooftop and ground-based options within the target search area. None of these were found to be suitable due to issues including lack of suitable design options; technical performance, and increased visual impact compared to the proposal subject of this Review. The proposal subject of this Review is therefore the only technically and operationally viable location to deliver improved 4G and new 5G coverage in this part of Glasgow.
- 6.12 The proposal also directly supports the economic and social objectives of these policies. High-speed digital connectivity is now critical to economic growth, social inclusion, and the functioning of essential services. The proposed installation will deliver substantial improvements to mobile coverage; capacity and performance for residents, visitors and businesses in the Finnieston and Kelvingrove areas of Glasgow.
- 6.13 **Planning Balance and Material Considerations**
- 6.14 While the proposal will introduce a degree of visual change, this must be weighed against the substantial public benefits it delivers. National policy is clear that advanced, high-quality communications infrastructure is essential to economic growth, social well-

being, and environmental sustainability. NPF4 seeks to “encourage, promote and facilitate” the rollout of such infrastructure across Scotland.

- 6.15 Improved mobile networks bring significant economic benefits, including increased business efficiency, enhanced remote working capabilities, and support for emerging technologies such as augmented reality, smart grids and autonomous systems. Social benefits include improved access to services, reduced isolation, and enhanced emergency response. Environmental benefits include facilitating low-carbon behaviours, reducing travel demand and enabling smart energy systems.
- 6.16 These public benefits have consistently been afforded significant weight by Inspectors in similar appeal cases. For example, in recent decisions at Crow Road, Glasgow (PAC-260-2020, decision dated the 6th of June 2025, see Appendix 15) and Dumbreck Road, Glasgow (PAC-260-2018, decision dated the 11th of February 2025, see Appendix 16), Inspectors acknowledged that while some level of visual impact may arise, such effects were not considered to be harmful in planning terms when balanced against the substantial public benefits of enhanced 4G and 5G connectivity. In both cases, it was concluded that the proposals represented the least harmful solution to addressing a clear coverage need, and that the delivery of essential digital infrastructure outweighed any minor adverse impacts identified.

Key excerpts from the decisions:

Crow Road (PAC-260-2020):

“Taking all factors into account, I am satisfied that the siting and appearance of the proposed pole are acceptable and that any minor adverse effect on the amenity of the locality is clearly outweighed by the improvements to local telecommunications provision that the proposal would provide.”

Dumbreck Road (PAC-260-2018):

“In this case I consider that the need for the equipment outweighs any harm. I also consider that the appellant has endeavoured to minimise the impact of the proposals on the local area whilst seeking to improve network coverage. On balance, the appeal site appears to be the least harmful option, and the public benefits of the proposals outweigh any identified harm.”

- 6.17 In conclusion, the proposed installation has been carefully sited and sensitively designed to minimise visual impact while meeting an essential operational need in the most appropriate and technically viable location. Any limited visual effect arising from the development is significantly outweighed by the substantial public, social, economic and environmental benefits it will deliver, including enhanced 4G capacity and vital new 5G coverage for residents, businesses and public services in the Finnieston and Kelvingrove areas. The proposal fully accords with the objectives of NPF4 Policies 7, 14 and 24, together with CDP 1, 2, 3 and 9, by supporting sustainable growth, protecting the historic environment, and delivering critical digital infrastructure. It therefore represents a well-balanced and policy-compliant form of development that should be supported through the Local Review process.

7.0 Discounted Options

- 7.1 In accordance with the license obligations and advice in the NPF4 and the Code of practice the appellant’s network rollout team undertook an inspection of the areas of search, which investigated the following siting and design options using this sequential approach to site selection:
1. Upgrading the operator’s own existing base station(s);
 2. Using existing telecommunications structures belonging to another code system operator, i.e., mast sharing;
 3. Co-location or site sharing alongside existing telecommunications development;

4. Installing a base station on an existing building or tall structure;

If 1-4 unavailable, the only viable option is:

5. Erection of a new ground-based mast.

7.2 The appellant's site selection strategy is to keep the overall environmental impact to a minimum. Utilising existing telecommunications sites is always progressed where it is technically and legally possible and where it is the local planning authority's preferred environmental solution.

7.3 An extensive number of sites were considered prior to the appeal site being selected. These were given very careful consideration with regard to the impact of development at each location in terms of visual and residential amenity, other planning issues as well as the technical suitability of each site to VodafoneThree and VMO2's network requirements. The location considered most acceptable in terms of all these factors (upgrading the existing and established communications site at 923 Sauchiehall Street) was selected and surveys were carried out to ensure the site was suitable and the development viable. The aerial map below highlights the Discounted Options considered as part of the exhaustive sequential approach:



Figure 15 – Map of alternative options considered and subsequently discounted.

The details of alternative sites considered prior to selecting the proposed site and design are contained below:

Ref	Location	NGR	Reason for Discounting
D1 - Existing Site	Existing H3G flagpole installation at St Vincent Bowling Club (22682), 37A St Vincent Crescent, Glasgow, G3 8NG	257065 665768	This replica flagpole structure does not have the structural capacity to support the equipment necessary to deliver the required mobile coverage in the area. Accommodating the equipment of all network operators at this location would necessitate a significantly larger structure, such as a lattice tower or a monopole with a headframe, extending above the height of the Listed tenement buildings to the north.

			Given the site's location within a Conservation Area and its proximity to several Listed Buildings, such a solution would have a much greater visual impact and is therefore not considered an appropriate option in terms of preserving the character and visual amenity of the area. A structure in this location would also need to extend above the height of the adjacent Listed tenement buildings to the north in order to overcome significant coverage challenges caused by the dense urban environment. Therefore, given the location of this site within a Conservation Area and in close proximity to several Listed Buildings, the scale and visual impact of a larger freestanding structure would be inappropriate. The proposed rooftop solution, by contrast, strikes a necessary balance, delivering the technical requirements for mobile coverage while minimising the impact on the character and visual amenity of the area.
D2 - Existing site	Existing Network Rail Mast, Minerva Way, Glasgow, G3 8NG	256860 665692	This is an existing Network Rail mast used exclusively for railway communications and operational safety systems. As a result, Network Rail does not permit Mobile Network Operators to share or install equipment on these structures.
D3 – Streetworks	Opposite 1071 Sauchiehall Street, Cranston Hill, Glasgow, G3 7TH	256812 666162	A previous planning application for the installation of a 15-metre-high monopole for Hutchison 3G (planning reference: 23/00798/FUL) was refused by the Local Planning Authority in June 2023 due to its impact on designated heritage assets, including Kelvingrove Park, its associated listed features, and the surrounding Listed Buildings within the Park Conservation Area. The proposal was deemed to have a detrimental effect on visual amenity and to dominate the streetscape. It is considered that siting the new apparatus sympathetically on a rooftop where telecoms equipment has been long established, such as the Lorne Hotel/student accommodation, minimises visual amenity concerns and would be viewed more favourably from a planning perspective. This location was also assessed to be too far west to adequately meet the coverage requirements within the surrounding area.
D4 – Greenfield	Glasgow City Council Western Depot, Kelvinhaugh Street, Glasgow, G3 8PB	256885 665905	A very tall ground-based structure would be required at this location in order to provide coverage over the tenements to the northeast towards the target area. In areas like this, where four-storey sandstone tenements dominate the streetscape, ground-level installations are unable to provide effective coverage. The thick stone construction and closely spaced buildings

			obstruct signal propagation, limiting coverage to individual streets and preventing reliable service across the wider area. A rooftop installation at a height above the surrounding tenements is therefore essential to achieve clear lines of sight and enable the signal to reach into multiple adjacent streets. This is what is being proposed with the site subject of this application, which is located on an existing rooftop where telecommunications equipment has been long established, ensuring both optimal coverage and minimal visual impact.
D5 – Greenfield	Glenpack Ltd Kelvinhaugh Street, Glasgow, G3 8PB	256916 665911	Similar to D4, a very tall ground-based structure would be required at this location in order to provide coverage over the tenements to the north. In areas like this, where four-storey sandstone tenements dominate the streetscape, ground-level installations are unable to provide effective coverage. The thick stone construction and closely spaced buildings obstruct signal propagation, limiting coverage to individual streets and preventing reliable service across the wider area. A rooftop installation at a height above the surrounding tenements is therefore essential to achieve clear lines of sight and enable the signal to reach into multiple adjacent streets. This is what is being proposed with the site subject of this application, which is located on an existing rooftop where telecommunications equipment has been long established, ensuring both optimal coverage and minimal visual impact.
D6 – Streetworks	Bentinck Street, Parkgrove Terrace and Derby Street, Kelvingrove, Glasgow, G3 7TU	Various	Sites at Bentinck Street, Parkgrove Terrace, and Derby Street have been discounted due to the presence of tall sandstone tenement buildings, which substantially restrict radio signal propagation as previously discussed. These locations do not provide feasible opportunities for the installation of slim, street-wide poles, while the narrow street widths and heritage designations further constrain potential infrastructure solutions. Moreover, the proximity of residential properties raises significant challenges in ensuring compliance with ICNIRP public exposure guidelines, thereby rendering these sites unsuitable to meet the necessary coverage requirements.
D7 – Streetworks	Sauchiehall Street, Kelvingrove, Glasgow, G3 7TQ	257036 666009	Similar to the above, various locations on Sauchiehall Street have been discounted due to the presence of tall sandstone tenement buildings, which substantially restrict radio signal propagation as previously discussed. These locations do not provide feasible opportunities for the installation of slim, street-wide poles, while the narrow street widths and heritage

			designations further constrain potential infrastructure solutions. Moreover, the proximity of residential properties raises significant challenges in ensuring compliance with ICNIRP public exposure guidelines, thereby rendering these sites unsuitable to meet the necessary coverage requirements.
D8 – Streetworks	Land adjacent St Vincent Crescent, Kelvinhaugh, Glasgow, G3 8PA	256777 665763	Similar to the above, this location was discounted due to the presence of tall, four-storey tenement buildings immediately to the north, which create significant physical barriers to radio signal propagation. The dense arrangement and substantial thickness of the sandstone construction severely restrict onward signals, resulting in limited coverage beyond the immediate street frontage. Moreover, the proximity of residential properties raises significant challenges in ensuring compliance with ICNIRP public exposure guidelines, thereby rendering this area unsuitable to meet the necessary coverage requirements.
D9 – Greenfield	Land at University of Glasgow Bowling Club, Finnieston G3 8NG	256923 665765	A site at this location would be too far south to provide the required level of coverage to the northern half of the cell area. Furthermore, the presence of tall sandstone tenement buildings in the northern section of the area would significantly impede signal propagation, limiting effective coverage. Additionally, there is a lack of suitable siting opportunities within the bowling club to accommodate a new base station without adversely impacting club activities.
D10 – Greenfield	Land at St Vincent Bowling Club, Kelvinhaugh, Glasgow, G3 8PA	256964 665762	The Bowling Club has confirmed that there is no additional space available to accommodate another telecommunications flagpole at this location. Furthermore, a site here would be too far south to provide the required level of coverage to the northern half of the cell area. Additionally, there is currently no suitable flagpole design capable of supporting the size and weight of modern 5G antennas required to meet network demands. The surrounding area is characterised by tall sandstone tenement buildings, which significantly restrict radio signal propagation. These buildings act as substantial barriers to signal penetration and diffraction, making elevated rooftop installations essential to achieve effective coverage across multiple adjacent streets.
D11 – Rooftop	Category B Listed (HS Ref: 33075) Sandyford Henderson Memorial Church, Kelvinhaugh Street, Glasgow, G3 8NU	257045 665886	While Listed church buildings are often used to accommodate communications equipment, this building is made up of 3 steeply pitched roofs with no church or bell tower in/on which to install the required equipment. There is considered to be no suitable design solution to install antennas and associated equipment at the necessary height to oversee the surrounding tenement

			buildings without having an unacceptable impact on the character and appearance of the building and surrounding area. It is therefore considered that the upgrade of communications equipment on the un-listed Lorne Hotel/student accommodation will have less impact on the visual amenity than the installation of new communications equipment on this Listed church building.
D12 - Streetworks	Pavement on Fitzroy Place, adjacent Royal Crescent, Glasgow G3 7SL	257288 665961	It was considered that upgrading the existing communications equipment on the rooftop of the Lorne Hotel/student accommodation (a non-Listed building) would have a significantly lower impact on local character and visual amenity than the introduction of new streetworks-style equipment in this location. In this Conservation Area setting — which overlooks multiple Listed Buildings from both the north and south, any new ground-based installation would likely need to exceed 20 metres in height to achieve the required coverage given the height of these buildings, coupled with the presence of adjacent, established tree cover. At present, there is no approved streetworks design capable of supporting installations above 20 metres; therefore, a larger and more visually prominent structure, such as a lattice tower or monopole with a headframe, would be required. Such a solution would be considerably more intrusive and less appropriate in this sensitive context.
D13 – Greenfield	Entrance to Kelvingrove Park, Glasgow, G3 7SA	257198 666120	Similar to the above, it was considered that upgrading the existing communications equipment on the rooftop of the Lorne Hotel/student accommodation would have a significantly lower impact on local character and visual amenity than the installation of new streetworks-style telecommunications infrastructure at the entrance to Kelvingrove Park. This location sits within the Park Conservation Area and is in close proximity to several Listed Buildings, making visual sensitivity a key concern. Furthermore, the surrounding area is characterised by tall, four-storey sandstone tenements that severely restrict signal propagation from ground level. To overcome this, any new installation would likely need to exceed 20 metres in height to achieve the required coverage, particularly given the additional screening effect of mature tree cover in and around the park entrance. As current streetworks designs are limited to a maximum height of 20 metres, a significantly larger and more visually prominent structure, such as a lattice tower or monopole with a headframe, would be required. Such an installation would be

			wholly inappropriate in this sensitive and historically significant setting.
D14 – Greenfield	Land near Fitzroy Lane, Glasgow, G3 7RH	257272 665900	This location is situated on a narrow lane between two blocks of four-storey sandstone flats, which presents significant challenges for achieving adequate signal coverage. The height and density of the surrounding tenement buildings severely restrict signal propagation from ground level, particularly to the north. A very tall ground-based structure would be required at this location to clear these obstructions and provide the necessary coverage. However, the maximum permitted height for a streetworks-style pole is 20 metres, which would be insufficient in this context. As a result, a significantly larger and more visually intrusive structure, such as a lattice tower or monopole with a headframe, would be necessary. In contrast, the proposed rooftop installation on the Lorne Hotel/student accommodation is considered a more appropriate planning solution.
D15 – Streetworks	Pavement between Kelvinhaugh Street and Argyle Street, Glasgow, G3 8NU	257039 665916	This pavement location was discounted due to insufficient available space to accommodate a streetworks-style base station, given the presence of existing street furniture. In addition, the adjacent five-storey KAPLAN building presents significant challenges in terms of ICNIRP compliance, as its height and close proximity would make it challenging to achieve the necessary separation distances. The wider area is also defined by tall sandstone tenement buildings, which severely impede signal propagation from ground level. As the maximum permitted height for streetworks installations is 20 metres, any structure at this location would be unable to overcome these physical obstructions and deliver the required level of coverage. Accordingly, the site was discounted in favour of upgrading an existing rooftop installation, where sufficient height and established infrastructure provide a more appropriate and visually discreet solution.
D16 – Streetworks	Pavement South of Kelvingrove Community Tennis Club, Kelvin Way, Glasgow, G3 7TA	256966 666069	This section of pavement was discounted as it shows similar characteristics to a previously refused application further west (Discount 3), which was deemed to have a detrimental effect on visual amenity and to dominate the streetscape. The proposed siting adjacent to a five-storey block of tenement flats also raises concerns from an ICNIRP compliance perspective, due to the proximity of habitable windows and the inability to achieve the necessary separation distances. In addition, the height and density of the surrounding tenement buildings would significantly obstruct signal propagation from a ground-level installation.

			Given that the maximum permitted height for a streetworks-style pole is 20 metres, this location would not provide sufficient elevation to overcome these physical barriers and achieve the required coverage. By contrast, siting the new apparatus sympathetically on an existing rooftop installation, such as the Lorne Hotel/student accommodation, a site with long-established telecommunications use is considered to minimise visual amenity concerns.
D17 – Rooftop	Rooftop of 1079 Argyle Street, Glasgow, G3 8LZ	257233 665793	The rooftop of this residential block was discounted due to the absence of existing rooftop access, which would prevent safe installation and ongoing maintenance of telecommunications equipment. Furthermore, the lightweight nature of the building's structure is not capable of supporting the additional loading associated with a rooftop stub mast or individual sector antennas, including the necessary supporting steelwork and ancillary equipment. Providing new access would likely require the installation of an external staircase, which was not considered appropriate in terms of design or visual impact. Ultimately, the rooftop was deemed unsuitable as the building could not accommodate the structural and operational requirements of a telecommunications installation.
D18 – Greenfield	Cleared land adjacent 6 Corunna Street, Glasgow, G3 8PA	257075 665854	This cleared area of land was assessed for its potential to accommodate a new communications base station; however, a planning application was approved in 2022 (LPA Ref: 22/00049/FUL) for the erection of 15 flatted dwellings, rendering the site unavailable for telecommunications development. In addition, the surrounding built environment, characterised by tall sandstone tenement buildings, presents significant challenges to signal propagation from ground level. These structures would obstruct line-of-sight and significantly limit the effectiveness of any ground-based installation at this location. As such, the site was discounted due to both its unavailability and its inability to provide the required level of coverage within the target area.

- 7.4 As demonstrated within Figures 11 to 14 above, the search area is severely constrained due to a well-defined gap in high-quality 4G and 5G service provision across this part of the West End and Finnieston. A comprehensive sequential site search has been undertaken and fully exhausted within this limited area, clearly evidencing that no alternative locations exist which could meet the operational requirements of the network.
- 7.5 The appeal site is therefore the only viable location within the operator's search area capable of providing the necessary coverage to the identified target areas. It represents the most technically efficient and operationally effective solution to meet current and future network demand. The functionality of the proposed equipment at this site is not

constrained by surrounding structures or tree cover. While the rooftop is elevated, long-range visibility is notably limited and fragmented due to the dense urban form, the height and layout of surrounding buildings, and the curvature of the local road network. As a result, views of the rooftop installation are largely short-range, intermittent, and often obscured from street level.

8.0 **Conclusion**

8.1 Planning application 25/01332/FUL was refused on the basis of perceived conflict with NPF4 Policies 7, 14 and 24, and CDP 1, 3 and 9. However, this appeal statement demonstrates that the proposal is a necessary, proportionate, and policy-compliant response to a critical infrastructure need.

- The proposal arises from a clear and urgent operational requirement to enhance 4G provision and deliver new 5G services in a densely populated and underserved part of Glasgow.
- A comprehensive and sequential site search was undertaken and acknowledged by the Case Officer as “reasonable.” No alternative sites were found to be viable due to technical, structural, and planning constraints.
- The proposed rooftop site is already established for telecommunications use and is the only viable location to meet coverage needs without introducing greater visual or environmental harm.
- The design has been refined to the absolute minimum scale and height, with all equipment enclosed in a GRP structure colour-matched to the existing plant room. This ensures the installation is visually recessive, coherent, and discreet.
- The host building is non-listed, modern, and taller than surrounding properties, making its rooftop inherently more suitable than other options within the Conservation Area.
- Views of the installation will be short-range, fragmented, and largely obscured, with no significant harm to the character or appearance of the Conservation Area or nearby listed buildings.
- The public benefits—including improved digital connectivity, economic growth, social inclusion, and support for essential services—are substantial and well-evidenced. These benefits decisively outweigh any limited visual impact.
- The proposal aligns fully with the aims of NPF4 and the Glasgow City Development Plan, and reflects a design-led, technically justified, and environmentally sensitive solution.

8.2 In short, this proposal is not perfect—but it is the least worst option. It delivers essential infrastructure in the only location capable of doing so effectively, while minimising harm and maximising public benefit. It is respectfully requested that the Local Review Committee allow this appeal and grant planning permission.

9 **Appeal Contents**

- 01 Application Form
- 02 LPA Neighbour Notification
- 03 Full Planning Application Cover Letter
- 04 Site Specific Supplementary Information
- 05 ICNIRP Declaration with Clarification Letter
- 06 Location Plan
- 07 Planning Drawings
- 08 General Background Information for Telecommunications Development
- 09 Health and Mobile Phone Base Stations
- 10 Letter to Leaders Supporting Digital Infrastructure
- 11 LPA Decision Notice
- 12 LPA Officers Report of Handling
- 13 Photomontage Report
- 14 Crow Road Appeal PAC-260-2020
- 15 Dumbreck Road Appeal PAC-260-2018
- 16 Appeal Statement