

By email to: planningonline@aberdeenshire.gov.uk

Ms Caitlin Stephen
Planning Officer
Aberdeenshire Council
Viewmount
Arduthie Road
Stonehaven
AB39 2DQ

20 March 2023

Dear Ms Stephen

Erection of a 25m High Lattice Tower with Associated Equipment and Ancillary Development Including Formation of Access Track on Land at Baldownie, Invercauld Estate, Aberdeenshire.


Planning Reference: APP/2023/0310

1. Mountaineering Scotland wishes to comment on the proposal under the Shared Rural Network initiative for a new digital telecommunications mast at Baldownie, on Invercauld estate.
2. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.
3. Our interest lies with potential visual impact on landscape of the proposed installation access track. From the information supplied by the applicant we note that the 300m of new track would run directly up a steepish slope from the existing track which follows the contour line, and will have visibility from the surrounding area.
4. We find that there is inadequate information in the Design and Access Statement to properly assess the potential visual impact of this proposed track. A full construction method statement is required that states construction and restoration specifications.
5. The information required to properly assess this track proposal would include a commitment that contractors would adhere to the guidance offered in the SNH report Constructed Tracks in the Scottish Uplands.
6. Criteria that would assist assessment of potential impact would include:
 - The design of the proposed route to the installation site, including drainage measures, bank cutting and land forming;

- The source of crushed stone used, and location of any borrow pit required to supply this – imported stone aggregates may have a different chemistry than the surrounding rock, leading to obviously different vegetation growth;
- Track width required for installation;
- Track width required for infrequent maintenance access – since infrequent use is stated, a standard 2.5m wide track for 4x4 access would seem sufficient;
- Restoration techniques, including preparation and turf storage if required for edging on a restored track;
- A requirement for sowing a central vegetated strip to reduce the visual impact of the raw stone and aid vegetation regeneration. Natural revegetation in the Scottish hills is often slower than expected, compared to lowland areas, due to the exposed nature of the terrain and the poor soil nutrients to aid vegetation colonisation of raw stone. There is a legacy of run-of-river hydro tracks in the highlands that amply illustrate this point.

7. Mountaineering Scotland requests Aberdeenshire Council seek this information from the applicant in order to address these issues before considering planning consent and conditions.

Yours sincerely



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