

By email to: planning@lochlomond-trossachs.org

Ms Amy Unitt
Planning Officer
Loch Lomond & Trossachs National Park Authority

17 August 2023

Dear Ms Unitt

**Erection of telecoms mast and installation of associated equipment | Coire Garbh Off A82
Arrochar Stirlingshire G83 7DZ**

Planning Reference: 2023/0235/DET

1. Mountaineering Scotland **objects** to the proposal under the Shared Rural Network initiative for a new telecommunications mast at Coire Garbh, on the slopes below Ben Oss, near Tyndrum, due to its adverse visual impact on the landscape and qualities of the Wild Land Area, not outweighed by benefits of digital connectivity for local residents and businesses.
2. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and snowsports 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 effects on mountaineering interests, specifically in this case the visual impact on landscape of the proposed compound and access track, as seen from the popular Munros of Ben Oss and Beinn Dubhchraig.
4. The proposed construction access track and levelled compound would be situated on a steep south facing slope, with potential for high visibility from nearby summits to the north and north-east. The compound would create a level angular intrusion into a rolling slope, with an obvious track leading up and down the line of slope.
5. It is our opinion that the Landscape and Visual Impact Assessment underplays the significance the visual impact in a landscape of high sensitivity, as seen by hillwalkers who are receptors of high sensitivity moving slowly through the landscape, and over a period of 20 years which is of long-term duration.
6. The section on the Site Selection Process in the Supplementary Information document (section 6 page 11) states that the alternative locations investigated and assessed would result in "a significantly adverse and visually intrusive features (sic) to drivers passing by and nearby residential properties". We question how a proposal may be significantly adverse in similar, but less remote landscapes, and to transient receptors travelling fast along the A82, yet minor adverse in a landscape whose elements, qualities and character are designated as being special and worthy of conserving.


7. It is noted that there are existing development features in Gleann nan Caorann such as power line pylons and a hydro pipeline and intakes. We recognise that this is not a landscape untouched by built infrastructure, few places are, but the existing development lies along the lower part of the glen, in a linear fashion, below 350m OD. This proposal extends at a perpendicular angle up the slope to an altitude of around 600m OD, closer to hillwalkers viewpoints. There is also the potential noise pollution from a biofuel generator to power the array which has not been addressed in the proposal. We regard this as a significant change to the landscape character.

8. The need for digital connectivity is a policy imperative, for local residents and businesses. We support this policy aim. NPF4 Policy 24 is relevant here, and this proposal fails to demonstrate that local residents and business will benefit from this new proposal. It is not made clear in the document that existing structures are unsuitable to be shared in order to expand consumer choice, making this proposal unnecessary. It is our view that the digital connectivity for people travelling along a section of the A82 and for hillwalkers is a convenience, not a policy need, and that the adverse landscape impacts outweigh the benefits of the proposal for transient users.

9. We wish to bring attention to the poor quality of the application, with no restoration proposals for access track construction in a National Park. We note also the perfunctory pro-forma template approach to this application, with references in the Supplementary Information to South Ayrshire Development Plan (p9), and to 'this part of rural Lewis' (p7). This copy-and-paste approach demonstrates a slap-dash attitude to the assessment of the need and impact of the proposed development and is inappropriate for serious consideration in a National Park and Wild Land Area.

10. Mountaineering Scotland **objects to this proposal** as an inappropriate location where the adverse landscape and visual impacts outweigh the digital connectivity benefits for tourists and commuters on the A82

Yours sincerely



D. Black

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