

By email to: eplanning@highland.gov.uk

Ms Jennifer Mair
Planning Officer
The Highland Council

19 April 2024

Dear Ms Mair

Erection of 25m high telecoms mast, equipment cabinets, solar array, generator on land 660M NW of Strawberry Cottage, Athnamulloch, Glen Affric, Cannich

Reference: 24/01181/FUL

1. Mountaineering Scotland **objects** to this proposal under the Shared Rural Network initiative for a 4G digital telecommunications mast near to Strawberry Cottage in Glen Affric. Our objection is based on the protection and conservation of the visual and wild landscape qualities of this area, as perceived from our mountaineering perspective.
2. We are concerned that the methodology of the SRN programme is resulting in some telecom mast proposals being sited in locations where they will not provide significant benefit to rural communities and business, or the public road network, and will harm visual amenity and landscape qualities.
3. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the 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.
4. Our interest lies with potential effects on mountaineering interests, specifically in this case the effect of visual impact on the special qualities of the landscape of the proposed mast compound and ancillary power generation equipment, within the Glen Affric National Scenic Area and Wild Land Area 24: Central Highlands.
5. The need for digital connectivity is a policy imperative, for local communities and business, and along the public road network. We support this policy aim. NPF4 Policy 24 is relevant here, but this proposal fails the policy objective of clause 24d): "Development proposals that deliver new connectivity will be supported where there are benefits of this connectivity for communities and the local economy". The applicant in this proposal provides generalised benefits of digital connectivity across the country but fails to demonstrate specifically how local residential areas or local business premises will benefit from this proposal. There are no permanent residences or public roads within this landscape.

6. This is a significant civil engineering proposal in an area of significant national landscape value and lightly touched by human activities, recognised as such in the identification of its National Scenic Area and Wild Land Area status. The qualities of the WLA are recognised as a national asset to be conserved for future generations to enjoy, as we do.

7. NPF4 Policy 4 c) and g) provides protections for specific landscapes of national importance and value. Policy 4c)ii indicates that landscape impacts may be outweighed by social environmental or economic benefits of national importance. At this specific location there are no obvious environmental benefits demonstrated by this proposal. Economic benefits of national importance are not in evidence at this location as the only residences are a bothy and hostel, remote from the public road network and any potential economic benefits would be insignificant on a national scale. Similarly with social benefits at this specific location as 4G digital connectivity would be at best a local convenience, and not a national necessity. Visitors to remote shelters with limited facilities tend to seek out and value the qualities described in the NSA and WLA descriptions. A modern telecommunications mast does not enhance those landscape qualities.

8. Policy 4g)ii is a significant test here as the policy states that “development proposals in Wild Land Areas will **only** be supported where the proposal... is for a small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area.” The applicant has not demonstrated that the hostel or bothy need this connectivity and support the proposal, nor has the local community council indicated that it is of a fragility requiring this specific proposal at this location.

9. There are both individual and cumulative effects on the perceptions of landscape with other 4G mast proposals as hillwalkers, the ‘receptors’, walk or cycle slowly through the landscape. The sequential effect on the perception of landscape qualities is significant and this effect of the impact of the SRN network on the NSA and WLA needs to be taken into account when assessing the effects of landscape and visual impact of this proposal.

10. Weighed against NPF4 Policy 4 g) this proposal does not appear appropriate for a landscape with wild qualities, remote and removed from local residential and business needs. The stated Policy Outcomes in NPF4 Policy 24 are of a general national application and are outweighed by the site-specific policy protections of NPF Policy 4 for the adverse effects of landscape and visual impacts of this proposal at this location.

11. It is our assessment that the potential visual and landscape harms at this location outweigh any proposed specific benefit of digital connectivity. Mountaineering Scotland **objects** to this proposal and urges The Highland Council to reject it as an inappropriate proposal for a Wild Land Area.

Yours sincerely



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