



Mountaineering Scotland

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Dear Ms Prins

**16/00836/FUL New forestry grade maintenance access road from car park base station to plateau, top station of chairlift
White Corries Ski Centre Kingshouse Glencoe Ballachulish PH49 4HZ**

This letter confirms our submission made via the planning portal this morning. I would appreciate your acknowledgement in due course.

1. The Mountaineering Council of Scotland (MCoFS), also known as Mountaineering Scotland, objects to the proposed development on grounds of landscape and visual impact.

The Mountaineering Council of Scotland (MCoFS)

2. The MCoFS is an independent organisation with 13,000 members who are hill walkers, climbers and ski tourers. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.
3. We also act in Scotland for the 80,000 members of the BMC or British Mountaineering Council, which fully supports our policy on landscape and contributes direct financial support to our policy work.

Rationale for Objection

4. It appears remarkably lacking in forward planning for the applicants to gain consent for new uplift and only then, apparently, to consider how it will be built.
5. It is clear that, if consented, the proposed development will act as a gateway to further development, with incrementally accumulating potentially adverse impacts (cf ES para 4.7). Master-planning, as referred to in para 2.2 of the Environmental Statement, is intended to shape the totality of a development and come at the start, not after gaining one planning consent and making another application.

6. The application is based on cost, convenience and facilitating future development. The proposed gravel road is contrasted with helicopter use. Proper master-planning would consider other options such as an aerial ropeway, advertised as capable of taking individual loads of 40 tonnes, and which could be designed to be dual use to provide secure gondola-type access when not required for construction loads.
7. One of the positive features of the White Corries ski area to date has been its modest visual impact outwith the developed area. The eye-catching exception to this is the existing tracking on the steep slope east of the ski centre to be traversed by the proposed road. The clear visibility of this track erosion from the A82 shows both the vulnerability and open aspect of the slope. Despite the gloomy photography, this is also repeatedly shown in the ES photographic study. This erosion is used to support the case for a road to be built: an alternative reading is that it shows the poor stewardship of the area by Glencoe Mountain Ski Resort.
8. The proposed road is very steep and it will be extremely challenging to avoid constant erosion and surface mobility. The application documents differ on the actual gradient of the road. The Environmental Statement refers to an average gradient of 1:7.5 (para 5.12), which is 13.3%. The Design Statement refers to an average 1:12 gradient (8.3%). The Landscape and Visual supporting information by Scottish Woodlands refers to approximately 3km of road rising approximately 320m (10.7%).
9. The environmental statement quotes forestry road standards at length but is coy on the standards set for gradient. The Forestry Commission Road Specification states that a maximum gradient of <8% in general is to be preferred, but gradients up to 10% are acceptable. Small lengths (<200m) up to 12.5% may be allowable provided that they are contained within an overall gradient of 10%. (This is also given in the Landscape and Visual supporting Information.) Depending which of the applicant's figures one chooses, the proposed gradient is at best on the margins of acceptability and at worst significantly exceeds them.
10. The proposed development is misleadingly referred to as a 'mountain track' and thus as 'a feature which, whilst not natural, is not entirely out of character for the area.' (ES Para 9.32) We disagree. This is an area where vehicle roads onto the open hill have remained rare compared with their proliferation in many parts of Scotland. A road zig-zagging up the mountainside here will be a jarring interruption between substantial areas free of such intrusions further north/west and south on the A82.
11. The transition from the spaciousness of Rannoch Moor to the enclosure of Glencoe and vice versa, whether on foot or in a vehicle, is a truly world class experience. The existing ski facilities do not enhance this but neither do they detract from it, although the erosion scars east of the car park do seem to be growing and becoming more eye-catching. A new road up the hill will detract from the experience.
12. When the entire area is snow-covered the road could be largely invisible (though possibly not if it is used as a regular route for machinery). However, the track will hold snow – the applicant expects it to (ES para 4.7) – and this will increase its prominence when it contains residual snow long after the hillsides have thawed.

Conclusion

13. It is disappointing that Glencoe Mountain has made this application. The MCofS recognises the value of Glencoe Mountain to the local area and its attractiveness to skiers and mountain-bikers. As such we have some regret in having to object but short-term cost and convenience are not a sufficient justification for such a

development in a National Scenic Area, especially in the absence of a public master-plan and without comprehensive investigation of other approaches that could support the long term development of the ski area without the damaging impacts of the present proposal.

Yours sincerely

David Gibson
Chief Executive Officer