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Ms Lucy Prins
Planning & Building Standards
The Highland Council
Charles Kennedy Building
Achintore Road
Fort William
PH33 6RQ

16th July 2019

Dear Ms Prins

Two pairs of zip wires, launch platform, 2 landing platforms, container style reception building, 2 floating jetties, access path to the launch. platform, mini bus turning area. Land 780M West Of Mamore Lodge, Mamore, Kinlochleven

Planning Reference: 19/02766/FUL

Mountaineering Scotland wishes to comment on this proposal for this zip wire development, specifically on the Visual Impact Appraisal.

Mountaineering Scotland is a membership organisation with over 13,000 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, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

We recognise that development activities will have impacts and accepts and encourages developments that work with the grain of nature and maintain the wild qualities of the landscape.

Our concerns lie with the information provided that assesses the visual impact of the wires. The Visual Impact Appraisal identifies that visual representation of the wires may over-emphasise their appearance, and we accept that it may be difficult to represent the appropriate scale in diagrams.

However, the applicant then asserts without any evidence that "wires of such small diameters are only likely to be perceptible at relatively close distances, of 100-200m, and so would be unlikely to be visible in more distant views from the local area."

These wires are a linear feature with a long span between towers that secure them, similar in many respects to power lines, albeit with slimmer wires. The lighting characteristics of the sky vary greatly under different weather conditions and, for instance, low-lying sunlight on rain-wet wires will have a

different visibility than dry wires at noon. The statement in the Visual Impact Appraisal fails to take this into account.

The National Scenic Area Special Qualities that are relevant here are:

“Loch Leven is a fjord-like sea loch which strikes deep into the upland of the NSA’s core...The expanse of calm waters affords a far brighter light to pervade than across the moor or within the Glen, and this glistening reflection, particularly in early or evening hours adds a magical air to the place.”

We think it is important to note that this aspect of the proposal is development that would cross the loch, other infrastructure running along the land. The potential for visibility of light on metal wires in a glen aligned east-west may be more significant than the Appraisal suggests.

This is therefore an aspect of some significance for the National Scenic Area. We believe that you as the Planning Authority will need some comparative assessment to be able to gauge any potential impact on the NSA. The lack of any comparative analysis of visibility of metal wires in varying light conditions undermines the value of the Visual Impact Appraisal, and may leave a decision open to challenge.

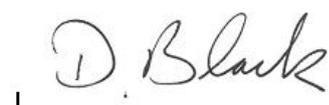
In assessing the impact of lines of wire in the landscape Scottish Power [1] and The Forestry Commission [2] have produced guidelines to help guide thought on how proposals may be perceived. They may be helpful in providing some context of how long lines of wires in the landscape may be viewed and their potential impact mitigated.

The Holford Rules for line routing have basic principles. Rule 1 states: “Avoid altogether, if possible, the major areas of highest amenity value.” Rule 4 suggests: “Choose tree and hill backgrounds in preference to sky backgrounds.” The Forestry Commission guidance recommends, “avoid areas of landscape sensitivity” and “avoid the line of sight of important views.”

In addition, we are of the opinion that a single viewpoint on the West Highland Way is insufficient. Walkers travel along the route in both directions, and an assessment of how often and for how long the proposed development would be visible would be beneficial in assessing visual impact. Walkers on the West Highland Way will be very sensitive to intrusive development.

We hope these comments are helpful in your consideration of the proposal.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a large, looped initial 'D'.

Davie Black
Access & Conservation Officer
Mountaineering Scotland

[1] Major Electrical Infrastructure Projects: Approach to Routeing and Environmental Impact Assessment. SP Energy Networks

[2] Design techniques for forest management planning. Forestry Commission