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By email to: eplanning@highland.gov.uk

Ms Erica McArthur Planning Officer

The Highland Council

20 November 2023

Dear Ms McArthur

Installation of 25.0m lattice tower, 3no. antenna, 2no. 0.6m dishes, 3no. external equipment cabinets, 1no. generator on new base, and all other ancillary development thereto, contained within a 1.8m high deer proof post and rail fenced compound | Land 2000M NE Of Stables Cottage Torridon

Reference: 23/04138/FUL

- 1. Mountaineering Scotland **objects** to this proposal under the Shared Rural Network initiative for a 4G digital telecommunications mast near to the Coire Mhic Nobhuil footpath, between Beinn Dearg and Liathach, on grounds of providing insufficient evidence for assessing landscape and visual impact, or for local community need for digital connectivity at this location.
- 2. This proposal as submitted fails to provide any means of assessing potential adverse visual impact in a National Scenic Area and Wild Land Area. The benefits of digital connectivity for local residents and businesses and the local economy have not been demonstrated, with an apparent lack of national or local need as there are no residences, business premises or public roads within reach of this proposed mast.
- 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 visual impact on the special qualities of the landscape of the proposed mast and compound, deep within Wild Land Area 27 Flowerdale-Shieldaig-Torridon and the Wester Ross National Scenic Area, as seen from the Coire Mhic Nobhuil path and the adjacent high ridges to the north and south.
- 5. We are unable to assess the potential landscape and visual impact against the special qualities of the NSA and WLA as the applicant has failed to provide either visualisations or graphical descriptions from recreational viewpoints. We urge the Highland Council to reject this proposal as it is insufficient to allow proper assessment or meaningful consultation.
- 6. The need for digital connectivity is a policy imperative, for local communities. 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 but fails to demonstrate specifically how local residential areas or local business premises will benefit from this proposal. There are no permanent residences within the locale.
- 7. Weighed against NPF4 Policy 4 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 are not met.
- 8. There is not any information on cumulative and sequential impact with other infrastructure, especially with similar telecoms proposals. Given that these masts need to be linked to form a network, what other proposals are anticipated, so that a true effect of the impact of the network on the WLA and NSA can be assessed?
- 9. Mountaineering Scotland **objects to this proposal** and urges The Highland Council to reject it as an inappropriate proposal for a National Scenic Area and Wild Land Area.

Yours sincerely

Davie Black

Access & Conservation Officer Mountaineering Scotland

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