

By email to: eplanning@highland.gov.uk

Ms Lauren Neil
Planning Officer
Infrastructure, Environment and Economy Department
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

1 September 2022

Dear Ms Neil

**22/03688/FUL | Erection of 8m high lattice radio mast | Land 4825M NW Of Keepers Cottage
Pitmain Kingussie**

1. Mountaineering Scotland **objects** to this application as the applicant has failed to demonstrate that the proposal conforms with planning policies in the Highland-wide Local Development Plan. Our concerns lie with potential adverse landscape and visual impacts on Wild Land Area 20 Monadhliath and the nearby hill summit of Carn an Fhreiceadain, a popular hillwalking destination.
2. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and skitourers 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 in this proposal lies with Carn an Fhreiceadain, a Corbett (summits between 760m and 910m) situated within a Wild Land Area, and the potential impact on the landscape and visual amenity of this summit enjoyed by hillwalkers. Also of concern is the potential visibility of the project and associated constructed tracks from the nearby Munros, Carn Sgulain and A' Chailleach.
4. We think that a radio mast proposal of this scale in this location must be assessed in line with the Local Development Plan. We are sympathetic to the landowner in carrying out their Duty of Care toward employees, however there is a range of options available for assuring safe working conditions for employees – mobile phone reception is just one of those options.
5. The relevant policies are Policy 45 Communications and Policy 57 Natural, Built and Cultural Heritage. We are unable to make any proper assessment of this proposal as the applicant has failed to provide evidence that this proposed development conforms to the policy intentions.

6. Policy 45 Communications states that the Council will support proposals which lead to the expansion of the electronic communications network in Highland. The explanatory text indicates that this is essential to achieve economic growth, and specifically in relation to the need to travel and therefore lead to a reduction in carbon emissions.
7. The applicant provides no information that a telecoms mast at this specific location fills a gap in coverage that is of benefit to the local community and would aid reductions in the need to travel. It would be beneficial to see an illustration of current cell coverage and what locational options would best fit identified gaps in coverage for the local community.
8. Policy 57 Natural, Built and Cultural Heritage states that for features of national importance, The Highland Council will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource.
9. Policy 57 goes on to state in the explanatory text that “Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services”.
10. The Scottish Government, in National Planning Framework 3, Paragraph 4.4 states “We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset.”
11. The applicant has provided no information that this proposed radio mast, situated within a Wild Land Area, does not adversely affect the qualities for which the area has been identified, or that there are over-riding national social and economic reasons for the proposal. Indeed, the stated intention is for “localised communication for the estate staff”.
12. The proposed infrastructure lies close to the Corbett summit of Carn an Fhreicheadain. We would expect to see some assessment of the significance of visual impact on hillwalkers, here and from the nearby Munro summits of Carn Sgulain and A' Chailleach. Hillwalking plays a part in Active Tourism and can be an economic benefit to local communities.
13. We urge The Highland Council to **reject this proposal**, as it does not demonstrate that it conforms with planning policy.

Yours sincerely



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