

Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

Lucy Prins, Case Officer ePlanning Centre, The Highland Council Glenurquhart Road Inverness IV3 5NX

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Dear Ms Prins

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

I am writing on behalf of the Scottish Wild Land Group [SWLG], which is a registered Scottish charity. Our members are concerned with wild land and all that is associated with it, including land use, the natural and cultural heritage and features of the landscape and geology.

The SWLG **objects** to this development proposal. Our grounds for doing this are our concerns regarding the adverse impact on the landscape and the visual impact that will be involved; the track construction details; as well as the lack of justification and inappropriateness of this application.

Landscape and Visual Impact

The proposal is in the Ben Nevis and Glencoe National Scenic Area [NSA] which is of great significance for its special visual amenity and landform. This is one of the finest landscapes in Scotland as, from the extensive high open Rannoch Moor the visitor enters the upper reaches of the impressive enclosed glen of Glencoe with its high mountain walls, a unique landscape in the country, before plunging down the glen to almost sea level. The journey through the glen is equally magnificent in reverse. This proposed mountain road will be visible from key receptor sites, including the Kingshouse Hotel and its environs, the A82 [an important tourist route], the West Highland Way and the Old Military Road.

The photomontages depicted in the Environmental Statement Visualisations are alarming, showing a huge impact on the landscape character and amenity. It is difficult to see what amelioration could be achieved by "careful design, siting and landscaping" as mentioned in the Preliminary Landscape and Visual Impact Review document in such an obvious position on a bare and open hillside.



In that same document, what on earth is the author trying to convey in the three bulleted points on page 2 under the heading "Landscape Feature and Character Impacts"? I have read this several times and am none the wiser.

The existing ski development on Meall a Bhuiridh is not as visually intrusive as the one at Cairngorm for example, as the main recreational area is hidden from sight from lower ground. This ski development has served Scottish recreational interests well for decades and until now, managed to do this without unduly scarring the landscape in this sensitive location and we urge The Highland Council to refuse this application.

Track Construction Details

These seem to be transposed from a forestry road guidance document which perhaps would explain the discrepancies in the gradients given as well as the mention of borrow pits which do not then seem to be depicted in the design diagrams and no details are given of their location, their restoration, the sourcing of other materials and so on. There are several essential details missing here which does not make one confident that the road would be robust and not cause erosion and prominent scarring due to drainage problems. There is no reference to the excellent SNH guidance on the construction of tracks in elevated locations, which would be far more appropriate than relying only on forestry standards in this high location, particularly in suggesting the line of a track which would avoid potentially problematic steep gradients.

The track width is given as 3.4 metres, which is excessive and will in itself make the road more visible. A road width sufficient to take the average 4x4 vehicle should be the maximum that is permitted in elevated and obvious locations, together with a central grass strip to make the road less obvious.

The storing and maintenance of turves would need to be monitored as so often we have seen these deteriorate and become unusable at exposed sites during the construction phase. In addition there would need to be careful separation and storage of any top soil which should then be reinstated in order to maintain the original soil profile which has taken so long to develop and is a component of ecosystem functioning.

It is apparent that construction will disturb peat, more especially at higher locations, and careful reinstatement should be a condition of approval, and monitored appropriately, should this application be granted planning permission.

There are points along the course of the track where there is a possibility that pollution and silting of water courses during construction could occur, especially in wet weather, which would impact on ecosystems. Again if planning permission is granted this would need to be monitored regularly as this is a frequent problem with such developments. It should be noted that the nearby Black Rock Cottage, used by many groups of skiers and mountaineers, sources local water and so their arrangements should be investigated and any pollution of their supply should be avoided.

Lack of justification and inappropriateness

Three purposes are given for the track as justification for its creation:

1. To facilitate future development works. These are not specified and this give rise to great concern over what future developments may be under consideration. Is a major tourist destination being envisaged? If this is the case the entire project should have been submitted to The Highland Council at an early stage rather than adopting a piecemeal approach which will probably be to further detriment of the location. Such huge uncertainty is totally unacceptable.

- 2. For use in regular maintenance activities why is there a demand for extra facilities now when the ski centre has been operating for several decades? Why should one extra uplift facility require a major road to be built? This is not the case in any of the other ski resorts in Scotland or abroad. Maintenance of a well kept facility should not be sufficiently frequent to justify the creation of a road as intended here. Other less intrusive methods of accessing facilities are available and have presumably been used at the ski development until now. If the reason is to save costs on helicopter uplifts and so on then this would need to be costed against the investment needed to build such a road to an acceptable standard, to maintain it and to keep it open in winter.
- 3. For emergency access is a sudden increased demand envisaged for rescue purposes? Again the ski centre has operated without problems in this area for decades so it is difficult to see what has changed. In any case, this road does not access all areas of the ski centre, so additional provision would be required on the hill. If at all possible most casualties would prefer the speedier rescue offered by a helicopter rather than being transported by some means to a road head and then by a vehicle, possibly down a road where there may be problems encountered due to snow and ice. If the intention is to get engineers and equipment to problem machinery quickly then other uplift facilities can be used, and again, presumably have been in the past.

It may well be that the developer wishes to increase MBTs by the provision of the proposed road. If this is the intention then a coherent plan needs to be submitted.

It may be worth noting that the Cairngorm ski centre operated by Natural Retreats has put in a retrospective planning application for a road which their contractors built without permission, associated with a previous application for which they had been granted permission to develop and similarly this road had not been included in the original application. There is concern that such practices and approaches create uncertainty and are an inappropriate way to get permission "by the back door". This application seems to be very much an afterthought, as the uplift facility associated with it was granted planning permission some time ago. Any need for this track should have been envisaged at the time of that application being submitted and discussed with the Council.

Other Considerations

There appears to be no consideration of fauna populations and ecology on site, despite a survey of flora having been conducted. It would be thought that a survey of species composition, populations and distribution should be provided for consideration of any likely impacts, such as habitat fragmentation.

The track is also in the territory of the Glen Etive and Glen Fyne SPA for golden eagles. While it may be assumed that the construction of a track, once completed, may possibly have no impact on eagle breeding and feeding success, as a result of its use, especially if used for recreation purposes, then there could be associated disturbance and some fragmentation of habitat. This would of course be in conflict with the European Birds and Habitats Directives which are transposed into the Scottish Habitat Regulations. This possibility also needs to be considered.

Based on our evaluation of this proposal, SWLG considers that The Highland Council should refuse planning permission for this mountain road.

Instead, the developer should be encouraged to discuss with the Council what their future plans for the ski development might entail, so that a plan can be devised and publically consulted on, instead of allowing development to proceed in a piecemeal nonstrategic way. If planning permission were to be agreed for this development then this would set a very undesirable precedent in Scotland.

I should appreciate an acknowledgement of receipt of this communication.

Yours sincerely

Beryl Leatherland