

Unacceptable telecommunications mast (17) – the Ryvoan planning application & the Cairngorms National Park

Description



View from mast site. This is the best location in Scotland for seeing how the Caledonian Forest is expanding up towards the altitudinal limits for tree growth. The path also provides an outstanding view of the Cairngorms at its wildest, with a complete absence of artificial structures like masts, pylons, fences or ski slope infrastructure. Photo credit Dave Morris July 2024

On 10th July Mitie, acting on behalf of Three, who are working for Digital Mobile Spectrum Ltd, who report to the Big Four mobile operators which include Three submitted a planning application to erect a 22.5m telecommunications mast by Ryvoan bothy ([see here](#) for planning papers). A week earlier David Craig explained on parkswatch ([see here](#)) the background to proposal, the associated planning application for a feeder mast by the ski road in Glenmore and why neither mast was sensible use of public money.

Since David Craig's post there has been the General Election, Peter Kyle has been appointed as the new Secretary of State of the UK Dept for Science, Innovation and Technology, and the chair of Building Digital UK (BDUK), Peter Blagden, who oversaw the Shared Rural Network programme responsible for the rash of masts in wild and unspoiled areas, has resigned ([see here](#)). There is no indication as yet, however, that the new UK Govt appreciates that spending £500m on removing 4G "Total Not Spots" is a total waste of public money and could be far better spent. David Craig and his brother Rober have set out the evidence for this in a series of posts ([see here](#), [here](#), [here](#), [here](#) and [here](#)). If you have the time please consider writing to your MP to alert them to the failings of the SRN programme and asking them to contact Peter Kyle requesting he instigates an immediate review.

The Cairngorms National Park Authority and the Shared Rural Network programme



Red dots are the Total Not Spot sites from SRNs own list, The circles are EAS sites the Home Office plan, but dont coordinate with the SRN despite claims to do so. Partail Not

Spot sites are not published, but the CNP planners may know.

To date the CNPA has given no consideration to the implications of the Shared Rural Network programme for its statutory aims. Some months ago I wrote to them suggesting that given the number of proposed masts in the National Park, it would be appropriate for their board to develop overall guidance for both developers and staff. I was told this would not be appropriate because all board members sit on the planning committee, the implication being that any guidance from the board might be seen to prejudice the quasi-judicial application process.

I replied to say I thought this was nonsense, issuing guidance is not the same as taking a decision on applications. I also pointed out the CNPA board had responded to the steady flow of planning applications from HIE at Cairn Gorm by asking them to produce a masterplan for the area to enable the CNPA to better understand how individual applications related to each other and contributed to the aims of the National Park. There is no reason why the CNPA should not ask the SRN to do the same for telecommunications masts, together with an explanation of how the overall plan was designed to take account of the National Park's special qualities and the protected areas within it.

Instead of taking a strategic approach to the planning applications that have been submitted for the area covered by the National Park, the CNPA has in most cases failed to use its call in powers and left the decisions to the local authority in whose area the mast would be located:

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Installation of 25m high telecommunications mast and ancillary development within fenced compound

Land North Of A86 Newtonmore PH20 1BE

Ref. No: 2023/0418/DET | Received: Fri 20 Oct 2023 | Validated: Fri 20 Oct 2023 | Status: Local Authority decision

Erection of a telecommunications mast and installation of ancillary cabinets

Land 130 Metres South West Of Clan Donnachaidh Museum
Pitagowan Blair Atholl PH18 5TW

Ref. No: 2023/0397/DET | Received: Thu 05 Oct 2023 | Validated: Thu 05 Oct 2023 | Status: Local Authority decision

Erection of 25m high telecommunications mast, antennae, dishes, cabinets, fenced compound and construction of 20m access track

Drumuillie Forestry Desisher Wood A95 Boat Of Garten

Ref. No: 2023/0334/DET | Received: Fri 04 Aug 2023 | Validated: Fri 04 Aug 2023 | Status: Local Authority decision

5m extension to existing 15m tower and installation of 2 300mm dishes

Telecommunications Mast Hillhead Glen Tanar Aboyne
Aberdeenshire

Ref. No: 2023/0079/DET | Received: Thu 09 Feb 2023 | Validated: Thu 09 Feb 2023 | Status: Local Authority decision

Erection of 30m high telecomms mast and ancillary development

Lainchoil Plantation Near C1124, Nethy Bridge Strathspey PH25
3EE

Ref. No: 2022/0401/DET | Received: Wed 09 Nov 2022 | Validated: Wed 09 Nov 2022 | Status: Local Authority decision

Extract from search of "mast" on the CNPA planning portal

Another example considered in detail by parkswatch was the proposed mast on Creag Dhu by

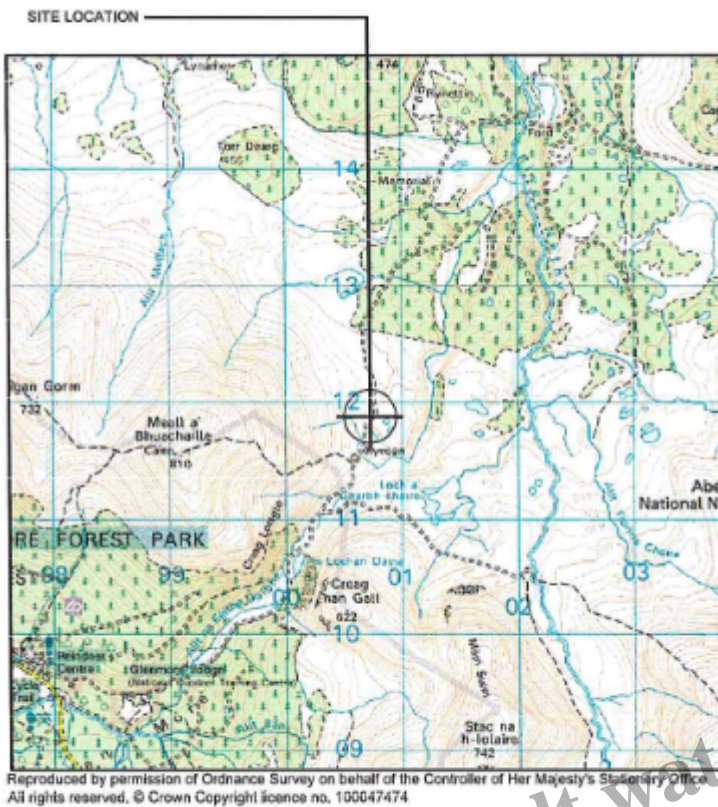
Newtonmore ([see here](#)) and ([here](#)) which, as George Allan explained ([see here](#)), was then rejected by Highland Council as being contrary to both the CNPA's Local Development Plan and National Planning Framework 4. This makes it all the more extraordinary that CNPA officers decided this mast did not have implications for the statutory aims of the National Park. Until staff call in an application there is no locus for the board and this makes it all the more important that the CNPA has in place clear guidance about when applications for masts will be called-in and why.

Of the planning applications for masts that the CNPA has called in to date, most have been withdrawn by the developer before any report was prepared by planning staff: Luibeg on the Mar Lodge Estate ([see here](#)); Creag Sroine at the north of Glen Feshie (2023/0083/DET) ; and recently that proposed for above Red Craig in Glen Clova (2023/0274/DET). As a consequence, there is no precedent to show what how CNPA planning staff are likely to handle the mast applications at Ryvoan and Glenmore or what recommendations they are likely to make to their board. Every reason therefore for the public to put as much pressure on the CNPA as possible with this applications, its important not just for the special area that is Ryvoan but all the other special places in the National Park.

The application, the landscape and wildlife

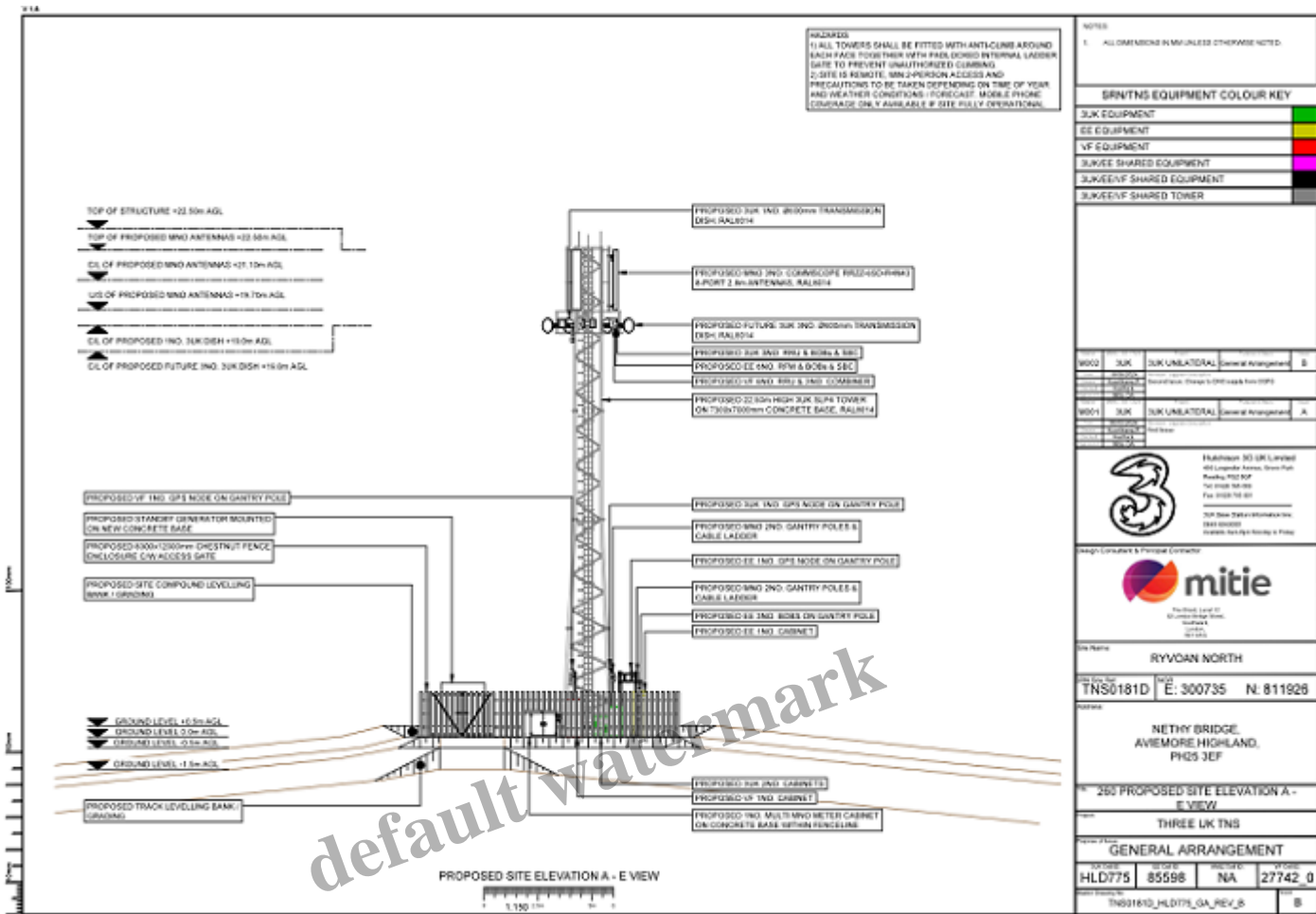
The proposed mast is located 400m north of Ryvoan bothy just off the existing track which connects Glen More and Abernethy:

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The proposed location is just outside the Cairngorms Wild Land Area (WLA) and the Cairngorms National Scenic Area (NSA) whose northern boundary runs by Ryvoan bothy. Locating masts in the WLA or NSA, particularly the latter where telecommunications masts lose their permitted development status and require full planning permission, would have created further hurdles to getting the mast through the planning system.

The proposed mast, however, is in a prominent position and being 22.5m high will clearly affect both the qualities of the WLA and the NSA.



The key to this drawing, top right, shows equipment from EE, Three and Vodafone but not O2. That is probably explained by O2 having just built the mast at Lainchoil – so if that mast was shared this one would not be needed by EE, Vodafone and Three.

This is significant because no Landscape Visual Impact Assessment has been provided with the application and Mitie has made no attempt to assess objectively its impact on wild land or the landscape.

The two photos Mitie has included in the application were taken in poor weather conditions:



View south from the proposed location, the V of the Ryvoan pass just visible in the background

and the sceptical might conclude they were chosen to reveal as little as possible about the landscape impact:



SITE PHOTOGRAPH

While saying as little as possible about the visual impact of the mast, there is an acknowledgement in the application that it will be an eyesore out of character with the surrounding landscape:

“Furthermore, in order to reduce contrast between the proposed development and the surrounding landscape, we would propose a to colour the lattice mast and associated ground-based equipment Sepia Brown (RAL8014).”

If successful that might result in more rare birds flying into it! While not in an NSA, all the land around Ryvoan is designated a Special Protection Area for birds and as a consequence the mast requires full planning permission (the proposed location lies with the Cairngorms SPA and adjacent to the Abernethy SPA). The site, which is on land owned by the RSPB, also lies within the Abernethy National Nature Reserve. There is no assessment within Mitie's application of its potential impact on wildlife. The RSPB have played an active role in alerting people to this application and are likely to submit robust evidence about this.

The original proposal was to power the mast with wind turbines and an array of solar panels – which would have increased both the visual impact and the risk to birds – but Mitie now proposes to connect the mast to the national grid. That connection is not part of the planning application and it is not stated if the connection will be overground or underground but whatever the case this will have further impacts on the Abernethy SPA and NNR and, if overground, on the landscape too. Despite the grid connection the application also includes provision for a standby generator.

The justification for the new mast

Mitie's supporting statement makes a number of claims about the need for this mast and the benefits it will provide which beg a number of questions. While admitting what David Craig explained in his post – “there may be few existing businesses or residential properties in the areas benefiting from a direct coverage uplift” – it goes on to assert:

“one of the principal benefits from the development and wider SRN project comes in the form of improved health and safety for those working and undertaking recreational activities here. Ultimately, it is expected that Estate workers (often lone working), walkers and hikers, as well as mountain rescue teams would see benefit in the introduction of 4G coverage in the area from all mobile Operators.”

If that is so, why then are the local landowner and main local employer, the RSPB, and the local crofters leader, Ruaridh Ormiston, objecting to the mast? As I have explained before, it is often those with long-term working relationships with an area (i.e people like farmers and estate workers rather than contractors) who value it most. Mr Ormiston quotes from the CNPA landscape policy “There will be a presumption against any development that does not conserve or enhance the landscape character and special landscape qualities of the Cairngorms National Park including wildness and the setting of the proposed development.....” after which he says “Please No”.

Many of those working in the countryside, including the mountain rescue teams mentioned by Mitie, already have access to satellite phones anyway and simply don't need 4G. Within a few years that is also likely to be the case for many recreational visitors, with the latest apple phones offering satellite technology. Mitie uses data from Strava showing the number of recreational visitors in the area in an attempt to demonstrate demand for this mast without explaining the implications: if Strava's satellite technology works throughout the area then 4G will soon be redundant.

Meantime, as David Craig showed, according to Ofcom the whole area is covered by 2G for emergency purposes. This makes a mockery of Mitie's claim that the mast is needed to help alert

emergency services to damaging wildfires:

“Despite having a year -round ‘no fires’ policy in Glenmore, various campfires were seen in the area, particularly near the Ryvoan Bothy to the South. With climate change creating generally warmer, drier conditions every year, wildfires have become increasingly more common..... This is another very strong justification for improved communications in the area in order to alert the emergency services of a fire quickly”

As for the claim that “sections of the public road to the North (connecting Sliemore and Nethy Bridge) and South in Glenmore will see benefit in the introduction of 4G network coverage in the area, as well a number of residential properties in and around Lettoch”, alternatives, such as much smaller local masts as erected elsewhere by EE, are simply not explored.

Sustainable development and wise use of resources?

Mitie then considers their proposal against the policies in National Planning Framework 4 starting with Policy 1: “When considering all development proposals significant weight will be given to the global climate and nature crises.” Instead of explaining how this mast – and other proposed masts in remote areas – will help reduce carbon emissions Mitie resorts to a general argument about the potential role of digital technology in addressing climate change:

“It is commonly understood that the provision of digital technologies had the ability to significantly reduce global carbon emissions. According to MobileUK’s publication: ‘Connectivity and Climate Change,’ high quality communications and connectivity can have a positive impact on accelerating the move to wind and solar energy; reduce emissions from transport; and transform the agricultural industry and rural economy through the use of drones and sensors connected to mobile networks. In the most remote locations, high quality digital connectivity has the potential to assist with many aspects of rural land management including deer surveys; protected species monitoring; peatland and woodland restoration monitoring; and re-wilding monitoring and reporting.”

Leave aside the facts that the RSPB clearly doesn’t want this mast for “deer surveys, protected species monitoring etc” and that Artificial Intelligence is anything but intelligent when it comes to energy consumption, there has been no assessment of the carbon cost of installing this mast (ie the carbon emissions caused by the construction of the component parts, the installation and the ongoing running costs – including that standby generator). Unless and until the Shared Rural Network programme produces proper carbon calculations showing otherwise, the carbon costs of installing and operating these masts would appear to be far far greater than any savings (while out enjoying the countryside on foot, on bike or on horse by definition people are consuming very little carbon and enabling people potentially to watch videos while on the hill can only make the situation worse, not better).

This brings me to the statutory aims of the Cairngorms National Park:

1 The National Park aims

In this Act, references to the National Park aims are to the following aims in relation to an area—

- (a) to conserve and enhance the natural and cultural heritage of the area,
- (b) to promote sustainable use of the natural resources of the area,
- (c) to promote understanding and enjoyment (including enjoyment in the form of recreational activities) of the natural and cultural qualities of the area by the public, and
- (d) to promote sustainable economic and social development of the area's communities.

The proposed mast at Ryvoan, and others like it, are clearly not wise use of natural resources (we need to start consuming less if the planet is to survive) but rather examples of unsustainable development. The only reason they are happening is the UK Government has agreed to pay for them through the SRN programme.

Up until now the CNPA has had a very poor record when it comes to assessing whether planning applications are compatible with its statutory aims. The best example is just across the hill from Ryvoan at Cairn Gorm. The CNPA approved the planning application to repair the funicular without assessing whether the £73.09 in public subsidy HIE had committed in its Business case over 30 years ([see here](#)) was wise use of resources. Nor did consider whether the repairs would work and therefore whether what was proposed was sustainable. In other words the CNPA could have used its planning powers to prevent HIE's funicular disaster at Cairn Gorm but failed to do so.

The CNPA should not make the same with telecommunications masts. It is quite predictable that whatever their short-term impacts on landscape and wildlife in ten years time or less they will be reduced to rusting hulks in what once were unspoilt areas of the countryside. It is time the CNPA took a stand, started to act like a National Park and in doing so did the whole of Scotland a favour by forcing the UK Government into a re-think.

You can comment on the application ([see here](#)) but be mindful that the CNPA quite unfairly restricts the time the public have to comment on applications to the statutory minimum, 28 days from 10th July.

Category

1. Cairngorms

Tags

1. Cairn Gorm
2. CNPA
3. landscape
4. masts
5. NatureScot
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