

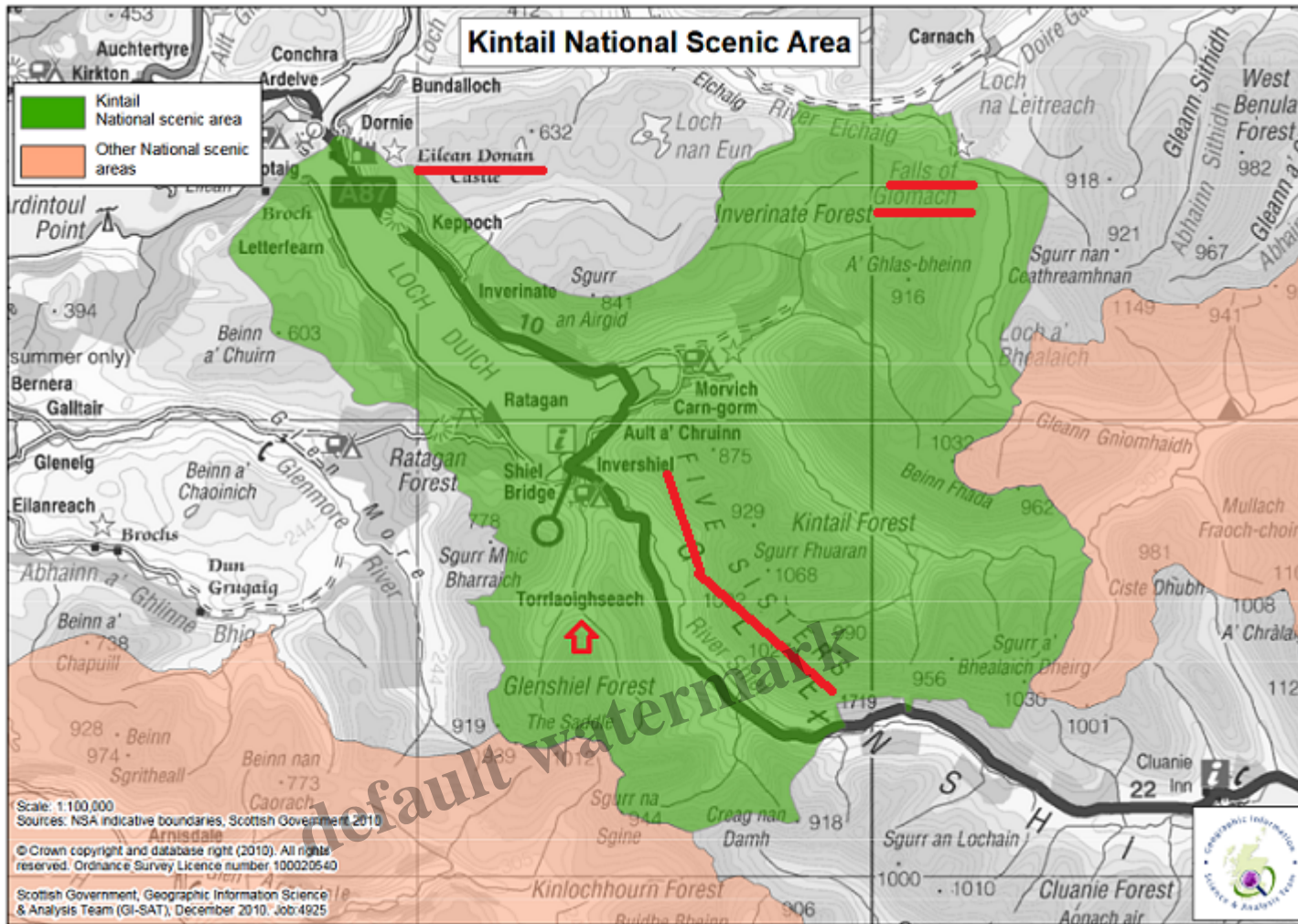
## Unacceptable Telecommunications masts (25) – National Scenic Areas, NatureScot & the case of Glen Undalain in Kintail

### Description



View up Glen Undalain from the start of the A Mhuing ridge near the Shiel Bridge Campsite. The track on the right is taken by the Cape Wrath Trail and the famous Forcan Ridge is visible rear left although the summit of the Saddle is hidden. The red line, not to scale, shows approx location of the proposed mast

At the end of August I wrote about the proposal to install a telecommunications in Glen Undalain, the glen which runs south from the campsite at Shiel Bridge towards the Saddle and is part of the Kintail National Scenic Area (NSA). While few people know about NSAs, the designation intended to protect Scotland's most beautiful landscapes, Kintail contains two of the most photographed landmarks in Scotland, the Five Sisters and Eilean Donan castle, as well as the famous falls of Glomach.



The red arrow marks the approximate position of the proposed mast in Glen Undalain. The mast is also in the Loch Morar – Knoydart – Kinlochhourn Wild Land Area.

The main protection that NSAs offer the landscape is that “permitted developments” allowed elsewhere require full planning permission. That gives Planning Authorities the power to refuse telecommunications masts which are being proposed under the Shared Rural Network programme where they are located in NSAs. This is different to Wild Land Areas where planning authorities can only influence the design of the development not stop it.



The location of the proposed mast and track from near the summit of Biod an Fhithich, the Corbett Sgurr Mhic Barraich right of centre and Skye beyond

Although I had walked along the lower part of Glen Undalain a couple of times in the past, my memory of it had faded so when in Kintail the week after New Year I took the opportunity to combine a hill walk with a visit to the glen. We started at the Shiel Bridge campsite. A short distance beyond the track up the glen from the rises over a small shoulder and you are into a wild unspoiled area with not a building or structure in sight (top photo). You could be 10k not 200m from civilisation and it feels like you are in a sanctuary. For walkers on the Cape Wrath Trail coming from the south the charms of Shiel Bridge are hidden to the last moment



Looking down onto the lower reaches of Glen Undalain from A Mhuing showing how the landforms block the view back to Shiel Bridge and, for anyone low down, Loch Duich.

NatureScot, the body responsible for our NSAs, put this very well in their description of the special qualities of the Kintail NSA written back in 2010 ([see here](#))

*“Moving inland from Loch Duich, the landscape and its atmosphere gradually shifts from being active and populated to being remote and wild. As the mountain fastnesses are penetrated, buildings and settlement are left behind and a sense of wildness comes to the fore.*

*A feeling of seclusion is engendered by narrow and winding glens that constrain the view and hide both the nearby summits and the distant settlements.”*

## **NatureScot’s response to the planning application**

Imagine my surprise therefore, on returning home and checking what had happened to the planning application, that I found NatureScot had responded as follows in September (i.e after my post and after three excellent objections had been submitted to the application):

## Summary

### Kintail National Scenic Area (NSA)

The proposal will not have an adverse effect on the integrity of the Kintail NSA or the objectives of the designation.

### Kinlochhourn – Knoydart – Morar Wild Land Area (WLA)

Whilst there will be localised effects, this proposal is unlikely to result in widespread significant adverse effects on the wild land qualities of Kinlochhourn – Knoydart – Morar WLA (WLA28).

### Appraisal of assessment of effects

The proposal lies within the Kintail NSA and Wild Land 18 – Kinlochhourn – Knoydart – Morar WLA. The proposal would be located at an elevation of around 160m Above Ordnance Datum (AOD) on the northern foot of Sgurr na Creige in Glen Undalain. The Cape Wrath trail passes within 150m of the development site. The proposal consists of a 30m high lattice tower, four solar arrays and associated infrastructure, as detailed in the supporting information. Access to the mast compound would be via an existing Right of Way (Scottish Hill Track 255) for the majority of the way with a new section of access track approx. 500m long by 3m wide to be constructed.

The applicant has provided a Landscape and Visual Assessment (LVA) and a Wild Land Assessment (WLA). We broadly agree with the scope of the assessment and agree that the most substantial effects on the Special Landscape Qualities (SLQs)/Wild Land Qualities (WLQs) would be fairly contained to a localised area. The proposal would extend the influence of modern human artefacts, but these effects would be localised and not affect the wider SLQs.

The Landscape and Visual Appraisal submitted at the end of July is NOT, as it makes clear, “a formal Landscape and Visual Impact Assessment and is outside the requirements of the Environmental Impact Assessment (EIA) Directive and Regulations”. There are no photomontages, for example, showing what the mast and track might look like from various viewpoints, which is one of the reasons I have only been able to mark the approximate position of the development on my photos. Instead of challenging this as part of its statutory duty to look after our finest landscapes, NatureScot “broadly agrees” with the assessment.

Without the information that would be required by an LVIA, NS’ assertion the proposed mast will not effect the integrity of the Kintail NSA is baseless. From my recent experience of visiting the glen and, I suspect, the experience of whoever described the special scenic qualities of Kintail, NatureScot’s assertion and the developers appraisal bears no resemblance to reality. Erecting a 30m mast; creating 500m of new road; laying out solar panels which will glint when the sun shines; and installing a noisy generator will all fundamentally change the special qualities of Glen Undalain.

At the very least, the developers for this and other such masts should be required to submit a full LVIA but NatureScot is not even prepared to say that. The change in their approach from 14 years ago is remarkable.



The approx line of the new track – with existing ATV erosion visible between the two red lines and the vertical red line showing the position of the track

In September 2023, in response to the SRN programme, NatureScot published advice to those applying to erect masts in National Parks, NSAs and Wild Land Areas ([see here](#)). The advice is very weak, quoting Scottish Government policy as set out in National Planning Framework 4 and clearly written with the presumption that new masts should go ahead. The advice does not even explain that tracks to masts are not permitted developments and that Planning Authorities have the power to refuse both tracks and masts in NSAs.

Under “Access” however, the advice does state: *“Access solutions which result in the least impact on the landscape should be explored during the design development stage and demonstrated in the Design Statement.”* That hasn’t happened with the Glen Undalain application. There is no description of the proposed track in the application (apart from it being 3m wide and 500m long) and no consideration of alternatives – but again NatureScot ignores that.

Neither NatureScot’s Advice note nor their response to the application contains any reference to their own guidance on hill tracks in the uplands ([see here](#)). But then that guidance is no longer being updated – as should have happened as soon as the Shared Rural Network Programme was announced – and has now scandalously been archived.

Instead, at the end of their short response NatureScot advises, rather than requires, *“that the ATV track be reinstated or measures taken to reduce the visual impact”* without any consideration of how the diesel needed to power the generator could then be transported to site. If the track is unacceptable, so too should be the mast.

## The waiting game

Reading between the lines it appears Highland Council planning staff may not be happy with NatureScot's response but are in a very awkward position because it is very difficult for a planning authority to reject a mast application when the body with statutory responsibility says its acceptable. That would help explain why the application ([see here](#)) appears to have progressed no further since September, apart from the submission of a Flood Risk Assessment – a ridiculous desktop exercise – at the end of October.

The longer Planning Authorities delay decisions on unwanted masts like Glen Undalain, which serve no local communities, the less likely they are to go ahead. At the beginning of December EE – one of the four mobile providers involved in the SRN programme to eliminate Total Not Spots – announced it had signed a trial agreement with Elon Musk's starlink to use SpaceX satellites to provide mobile coverage in areas where this is poor ([see here](#)). Other mobile operators are in the process of negotiating similar agreements with Amazon. While there are various technical issues to be resolved, it looks like masts in Total Not Spots will be totally redundant in five years time and we will be left with a new problem, how to remove abandoned masts from some of our finest scenic areas.

Unfortunately, so far there are almost no politicians at the Scottish or UK level who are prepared to say this or that most of the £1bn SRN programme is a total waste of money. Given the recent announcements about satellite coverage, however, NatureScot would be fully justified in updating their planning advice to state that because of forthcoming technological developments there should be a presumption against any new masts and their associated infrastructure in National Parks, NSAs and Wild Land Areas except where these serve local communities. And if they are too feart to go alone, why not make a joint statement to this effect with the Cairngorms and Loch Lomond and Trossachs National Park Authorities?

### Category

1. National Parks
2. Other parts Scotland

### Tags

1. landscape
2. masts
3. Nature
4. NatureScot
5. planning
6. Scottish Government

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