



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

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Ms Lucy Prins
Planning Department
The Highland Council
Inverness

10th March 2022

Dear Ms Prins

Development Proposal 22/00709/FUL, Upgrade and Repair of existing estate track between Barrisdale Estate and Loch Quoich

I am writing on behalf of the members of the Scottish Wild Land Group [SWLG] to **OBJECT** to this planning proposal. SWLG is an active member of the Scottish Environment LINK Hilltracks Group, formed in 2012, along with several other charities and NGOs. We scrutinise many local authority planning portals for applications for hilltracks and hillroads on a weekly basis, and submit comments where this is justified or where we feel we can suggest improvements.

In this case, it appears that the estate commenced work on the first 4 kms [a substantial length] of footpath nearest Barrisdale without first obtaining permission, whether via a full planning application or via a Prior Notification. Thus this section of the old footpath was worked on without any oversight, or agreements with the planning authority regarding mode of construction, impacts on landscape and wildlife, restoration post construction and so on. This is very bad practice on the part of the estate and one speculates how this came to light in this remote location. There are no illustrations of the work already completed in this section and of the original footpath, and one has to hope that THC has at least conducted a visual inspection via a site visit, although this would not in itself indicate the extent of the unauthorised works that had already taken place and the original condition and amenity of the footpath. We consider this to be very unsatisfactory. This application has been submitted as part retrospective and part new construction as a result.

We suggest that these two aspects are treated separately. A full retrospective application should be submitted for the first 4 kms of footpath and that planning conditions are set regarding some restoration where needed and necessary environmental aspects. The proposed new alterations to the old footpath should be refused permission.

This SWLG objection is based on the facts that

1. there is no credible justification for the track, and

2. the track will be an unacceptably intrusive and extensive feature into a valued area of the highest level of scenic value and remoteness, and
3. Construction details are inappropriate/inadequate.

Dealing with each of these in turn:

1. Justification. There is a degree of vagueness around the justification and need for the track, as the application says it is needed for land and deer management activities while the supplementary statement says it is needed for management and improvement works to the Glen Barrisdale SSSI. The latter is to include fencing, but there is no illustration of the siting of this and the form it will take; presumably deer fencing is envisaged. **We are concerned that there is not included with the proposal any sufficiently precise indication of the SSSI “improvements” planned or whether these have been decided on with discussion and the pinpointing of exact activities and changes over a period of time in a documented plan formally agreed with NatureScot. This is a major omission. If there is to be any deliberate change to an SSSI then we consider that this must be accounted for in a formal manner and with appropriate specialist input. There is no mention of any ecological or woodland advisers having been involved and clarification of this should be sought by THC, precise documentation should be produced and made available for public scrutiny and comment before any work is allowed.**

What is involved in “land and deer management activities”? This is far too vague as this phrase covers a whole range of possibilities. What are we expecting to see happening on the estate?

The application claims that there will be a lighter touch level of road construction over the route of the footpath as it travels towards Loch Quoich, it is stated that vehicle access will be much less frequent over this stretch. We **strongly oppose** the permitting of this level of damage to this location for the mere infrequent use of a vehicle. This proposal fails the public interest test on this point alone.

We note that the agent used by the estate, Proterra Energy, is an engineering solutions company, specialising in micro hydro schemes. The question inevitably arises as to whether the newly built road is designed as a precursor to a subsequent micro hydro plant application; although one hopes not and that Proterra have merely been used for their expertise.

THC will need to satisfy itself regarding the precise purpose of this proposed road, especially given its current historic and scenic value and importance.

2. Public value and cultural importance. The area through which this track would pass is in the Knoydart NSA and Wild Land Area 18 Kinloch Hourn, Knoydart, Morar. This is one of the most valued and unique areas of remoteness in Scotland. A track of this nature will have a hugely damaging impact on its qualities of landscape value and remoteness. We do not agree with the impact assessment in the Wild Land Assessment produced by the estate’s agent.

We don’t know whether THC planners have conducted a site visit, which we consider to be essential in these remote and valued locations, but there is not an existing track along the proposed development. On the ground is a historic old stalkers’ path, suitable for travellers on foot and stalking ponies. Throughout the application documentation, the applicant describes the footpath as a “track”. It is not a track. It is shown on all OS maps of the area as a footpath. It is shown on Memory Map as a footpath. It is shown on Google maps as a footpath, and on satellite imagery/overflight images along its length it is shown as a faint path, disappearing in places. It is disingenuous to describe the footpath as a “track” as that conveys an inaccurate impression to the reader who has not visited the area. No doubt the estate may use the footpath to drive ATVs along

it, which will inevitably damage it especially over soft ground. A light touch approach may feasibly enable sections of the footpath to be made more suitable for ATV use, without damaging the overall high quality of what is on the ground. The path is, contrary to what is stated in the application documents, a used long distance route – the use of the footpath is shown on the Strava heat map as well as guides. The perception of remoteness is very high in Glen Barrisdale especially after the first few kilometres as the old stalkers route continues to Loch Quoich. **It is important that THC appreciates the value of this now rare historical resource in their area and seeks to conserve it.**

3. Construction details. We are very concerned that, should this road be permitted, it will be difficult for THC to monitor whether the standard of works [during construction, environmental protection, final product] is of a high standard, due to its remote location, and should planning permission be permitted we will conduct our own site visits pre, during and post construction.

What is being proposed is too industrial for this location, with a 9 metre wide working corridor along a length of many kilometres, heavy machinery and so on. There is no indication of a construction site and how it will be managed; presumably it will be in the vicinity of the main estate building. Given the large number of watercourses we are very concerned around the risk of silting of streams, and it should be noted that the stated anticipated quantity of pollution prevention equipment to be used in this regard is probably going to be inadequate. There is a need to have the regular inspection of silt traps to be agreed and a record kept to account for this. In this respect, dated photographs could be sent to the planners to overcome the issues raised by the remote location as part of conditions, if the road were to be approved. We have taken advice on GBR9 and were told that in fact this assessment is probably not adequate and that a SEPA licence covering the works at the several stream crossings should be required. There is no statement to say that removed turfs will be maintained in good condition and replaced. Generally there is a dearth of information on the intentions regarding terrain and habitat restoration along the construction corridor and of borrow pits.

There is no mention of whether a Peat Assessment has been completed or even considered.

In such a remote location and with a range of valuable habitats it would be expected that the biodiversity would be good and typical of the area. It will probably be the case that due to the remoteness there hasn't been a detailed survey completed in the past, so there is no baseline. In the list of documents, for the Environmental Survey Report, Ecology report V1.2 by Atmos Consulting is mentioned yet this is not displayed on the planning portal; it is essential that those who are commenting on this proposal should have this available for scrutiny. We therefore ask that this is emailed to me and time given for its scrutiny and further comment.

Should you have any queries regarding the content of this objection, please get in touch.

Regards

Beryl Leatherland

