



John Muir Trust  
Tower House  
Station Road  
Pitlochry  
PH16 5AN

Highland Council  
Access track between Barrisdale Estate and Loch Quoich  
Highland Council planning reference: 22/00709/FUL  
Sent by email: [Graham.Sharp@highland.gov.uk](mailto:Graham.Sharp@highland.gov.uk)

25 January 2023

Dear Graham,

**Objection: Access track between Barrisdale Estate and Loch Quoich**

It is with regret that we submit our objection to the application for an access track between Barrisdale Estate and Loch Quoich (Highland Council reference 22/00709/FUL) (the 'Proposed Development'). The John Muir Trust owns land neighbouring the estate on which the Proposed Development would be sited and has engaged with the landowner to discuss our concerns. We welcome the landowner's willingness to engage. However, our concerns regarding the impact the Proposed Development would have on one of Scotland's finest examples of wild land remain and we feel we must object to the Proposed Development on the basis of our charitable objectives.

**Key areas of concern**

**Impact on Kinlochhourn - Knoydart - Morar WLA ('WLA') and Knoydart NSA ('NSA')**

It is concluded in the Wild Land Impact Assessment that the Proposed Development is likely to have a long term "*low effect*" on the wild land. This is "*mainly due to the fact that the track is an existing feature, rather than a new development*" (section 2.5, page 11). We question the truth of this statement and believe that the impact on wild land has been hugely underestimated.

Firstly, we would argue that the Proposed Development amounts to the creation of a new access track. The "*existing track*" is in fact only an old stalker's path, incomparable to the proposed ATV access track, which would be much wider (a standard 2m width), made of excavated stone, with new culverts and surface re-cambered. The significant difference between the proposed new access track and the existing path has been recognised in many of the public objections already submitted and is demonstrated by comparing Figure 5b, showing the clear visibility of the track already created, and Figure 5d showing the path yet to be "*reinstated*" (Viewpoint 2: Sgurr a' Choire-bheithe). The picture below shows the potential stark difference between an existing path and an ATV access track.



Secondly, the creation of a vehicular track into the heart of this wild land directly conflicts with the remoteness of the area which is a key landscape quality of both the WLA and the NSA. All but one of the key qualities in the WLA description highlight the remoteness of the area. Further, the description of the NSA states that it is “[o]ne of the remotest places on mainland Britain”. However, a development (such as the Proposed Development) which opens up an area characterised by its remoteness to vehicular access, significantly changes the quality of this special landscape. This is particularly the case, where the access track is a precursor for further development. For this reason, in addition to the permanent transformation of an old path into a new track for vehicle access, the significant adverse impacts caused by the Proposed Development cannot be considered “short term”. We believe that the Proposed Development is likely to have a significant and long-term adverse impact on both the WLA and the NSA.

#### **NPF4**

The Proposed Development does not fall within either of the two exceptions to the ban on developments within WLAs under Policy 4(g) of NPF4 (the policies referred to hereafter are within NPF4).

One of the special qualities of the NSA is that the area is ‘[o]ne of Scotland’s last great wild areas’. It can be assumed that the intention of Policy 4(g) is to protect WLAs against development, except in very restricted circumstances. We therefore believe that any proposed development within one of the finest remaining examples of wildness in Scotland, such as this, should be subject to the highest level of scrutiny. Particularly, where the adverse impacts of the development will not be outweighed by social, environmental or economic benefits of national importance.

Under Policy 4(g) development proposals in WLAs must be accompanied by a “wild land impact assessment which sets out how design, siting or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land”. We acknowledge that the application for the Proposed Development was submitted before this requirement was introduced, but as NPF4 should now be considered a “significant material consideration” the Proposed Development must be considered within this context. In any case, we do not believe that the significant adverse effects of the Proposed Development are of a nature that can be adequately mitigated against.

Under Policy 4 (c) developments affecting NSAs will only be supported where “i. *The objectives of designation and the overall integrity of the areas will not be compromised*” and “ii. *Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance*”. On Policy 4(c)(i), we believe that the objectives of the NSA - a designation intended to protect the special qualities of this area, which include it being “*one of Scotland’s last great wild areas*” - would be compromised by this development. On Policy 4(c)(ii), NatureScot in their advice concluded that there would be “*significant adverse effects in the short term on two of the special landscape qualities*” of the NSA. Although they went on to say that the “*the proposal will not have an adverse effect on the integrity of the NSA or the objectives of the designation*”, we do not see social, environmental or economic benefits of *national importance* outweighing the significant adverse landscape and visual effects of this new track through the glen, which in terms of its wildness and landscape quality, is of national importance.

For the reasons stated above, and in the absence of a restoration plan, we believe that the impact of the Proposed Development on the WLA and NSA has been underestimated and that the application fails to comply with national and Highland wide local planning policies that safeguard landscapes of national importance (NSAs and WLAs), in particular it fails to comply with Policy 4(g) and Policy 4(c) of NPF4. As such, we believe that the Proposed Development should be refused.

Yours sincerely,

The John Muir Trust