Agenda item 5

Appendix 4b

2026/0135/DET

Representations - objections

Comments for Planning Application 2026/0135/DET

Application Summary

Application Number: 2026/0135/DET
Address: Land 284M East Of Cairngorm Mountain Glenmore Aviemore
Proposal: Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works
Case Officer: Heather Boswell

Customer Details

Name: Mr Nick Kempe
Address: [redacted]

Comment Details

Commenter Type: Member of Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I wish to object to this application on the following grounds:
1) The primary justification for permitting any development at Cairn Gorm, one of the finest and most accessible mountains in the National Park, is its snow cover and that it provides an opportunity for snowsports that is not available elsewhere. Other visitor attractions, such as this coaster, are not appropriate and should be built elsewhere.
2) There is no Financial Business case for the development and no evidence that it meets the Park's statutory aim to deliver sustainable development.
3) The proposed permanent access track alongside the coaster uplift is a) contrary to Policy 4a in the National Park Partnership Plan which states there should be a presumption against new roads on moorland b) contrary to the NatureScots Guidance on Constructed Tracks in the Uplands that says the gradients of tracks should not be more that 14% - the proposed route appears to be 20% and will be highly prone to erosion c) cannot serve its claimed purpose for maintenance and emergency purposes because it is cut off from the downhill coaster track by the uphill track
4) The visualisation points in the LVA do not provide an adequate assessments of its visual impact, omitting close up views of the bridges and failing to consider its visibility in sunny conditions when the rail could gleam and glint. If the CNPA is nevertheless minded to approve the proposal on landscape grounds it should: a) require the metal rail to have a matt finish so it reflects as little light as possible b) require the applicant to produce a detailed woodland plan, including planting, designed to screen the track which it is then legally bound to deliver c) consider alternative solutions to the proposed coaster crossing the footpath by two bridges - these metal bridges will be more prominent than the rest of the track and very difficult to screen with trees.

Comments for Planning Application 2026/0135/DET

Application Summary

Application Number: 2026/0135/DET
Address: Land 284M East Of Cairngorm Mountain Glenmore Aviemore
Proposal: Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works
Case Officer: Heather Boswell

Customer Details

Name: Mr Ken Thomson
Address [redacted]

Comment Details

Commenter Type: Member of Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I write on behalf of the North East Mountain Trust (NEMT; Scottish Charity SCIO 008783), which represents the interests of around 1000 hill-goers and others those who enjoy visiting mountains and remoter areas, via individual and club membership.
The Trust objects to this proposal, on the following grounds:
1. The location, altitude and orientation of this track and its "associated structures", i.e. access tracks for construction and maintenance, drainage, fences, bridges, huts, etc., will make it highly visible from many miles away (and not only "from the surrounding hills", as in the CNPA EIA Application Screening Opinion Checklist). This will be especially so when lying partial-cover snow emphasises all artificial structures on the hillside.
2. The steep gradient (which is unclear from the planning information but appears to be about 1 in 5) will make erosion (and flooding during heavy rainfall and snowmelt) highly likely. Erosion might be reduced by using a hard surface rather than the usual grit, but this will mean higher visibility from afar. Reducing the gradient by zigzagging would also mean further (i.e. worse) visibility.
3. A new track would contravene the CNPA's policy presumption against new tracks on moorland (policy 4a in the National Park Partnership Plan).
4. Such "fairground attractions" are inappropriate to a mountain environment, and the cumulative effect is an ever growing 'industrialisation' of the area.
5. If CNPA is minded to approve the application, it should insist upon
a. adequate anti-visibility measures, e.g. non-shiny surfaces to tracks, rails, etc., and
b. woodland planting which will help to shield the installation over time.
Also, at this altitude, any "translocation of excavated turf" will probably fail. Greater efforts are needed to prevent the mess that was created in 2016 during work on the Shieling access track (and which in places is still visible today).

Proposed Toboggan Track

Cairngorms National Park

Planning application no. 2026/0135/DET

Objection from Dave Morris

I object to this planning application by Highlands and Islands Enterprise/Cairngorm Mountain (Scotland) Limited on the following grounds:

1. The planning application contains limited detail on the landscape impacts of the proposed development which are likely to be significant. No information is provided on possible alternative locations for such a facility, such as in the existing forest zone or further afield in Badenoch and Strathspey where landscape impacts are likely to be less and exposure to wind and rain is reduced. The principle of whether a toboggan track should be established high on Cairn Gorm, or elsewhere in the strath, should be addressed before any consideration is given to the details of construction. where there is better protection from wind and rain and less landscape impact. To make a planning decision at this stage would compromise future development requirements on Cairn Gorm and risk wasteful expenditure of public funds. The current application should be withdrawn.
2. Before any planning approval is granted for this proposed development it needs to be referred to Scottish ministers to examine both the planning merits of the proposal as well as the financial implications as regards the expenditure of public funds. Account needs to be taken not only of the overall development needs on Cairn Gorm but also the development requirements of other ski resorts in Scotland in the context of climate change and diminishing snow cover and the resultant demands for substantial public expenditure to sustain summer and winter operations. need to call in and determine this planning application, taking into account both the future development prospects on Cairn Gorm and other ski resorts in Scotland, along with the financial implications for public funding expenditure at the other ski resorts at Aonach Mor, near Fort William, Glencoe, Glenshee and the Lecht. Only the latter two resorts lie within the Cairngorms National Park. The future of all the Scottish ski resorts needs to be appraised in the context of climate change and the increasing lack of snow. HIE is not capable of making the necessary evaluations.
3. On Cairn Gorm HIE have known for the last 8 years that the construction of a toboggan track on the mountain, whatever its merits in planning terms, was not a priority. Their own consultants on future Cairn Gorm development, the SE Group, produced a report in 2018 which outlined the future options. That report was published a few months before the funicular railway was withdrawn from operation because of repair needs. It did not become fully operational again until early 2025. Because of the funicular repair needs HIE commissioned further work from the SE

Group who produced a supplementary report in 2019 which took account of the non-operation of the funicular.

4. Both of the SE Group reports highlight the need for new chairlift uplift as essential developments to improve the winter experience for skiers as part of the priority "Phase One" developments. And both reports include the proposed development of a coaster within Phase one. But the 2019 report states that "the mountain coaster is included in Phase One as a key source of revenue without the funicular". In other words, the priority attached to the coaster related directly to the non-operation of the funicular. New chairlifts, not a mountain coaster/toboggan track should now be the absolute priority once the funicular has been repaired and resumed operations. That should be a central consideration of CNPA planning policy given the CNPA's statutory duty to support sustainable mountain development.
5. It is astonishing, given these reports, that HIE appears to have done nothing over the last 8 years to advance the development of new chairlifts on Cairn Gorm, despite the fact that this would do far more to support the local economy than a toboggan track. Even more surprising, given the complexities that arose during the funicular repair process, that HIE have not advanced new chairlifts to the stage of planning applications given that the funicular repairs took far longer than anticipated and many people expect the funicular to fail again in the future.
6. Furthermore, the SE Group reports emphasise that, even when the funicular is working, it is not fit for purpose for winter use. The reports demonstrate that the funicular is operated at too low a speed to provide sufficient uplift in winter for both skier and snowboard visitors alongside the increasing number of non-winter sports visitors who also want to enjoy the experience of riding the funicular and using the viewing and restaurant facilities at the top station. Hence the priority, now and in the previous 8 years, is to build new chairlift facilities rather than a toboggan track. The latter has no value in terms of uplift for skier and snow board visitors and could be installed in many other locations. Meeting their needs is absolutely essential for regaining Cairn Gorm's reputation as the primary winter sports destination in Scotland.
7. Irrespective of all the above points, the planning application for the toboggan track is wholly inadequate. Two critical issues that have to be taken into account on this mountain, with any major development, is visual appearance, with its associated landscape impacts, along with the impact on soils and vegetation. The visual simulations provided by the consultants to demonstrate the close and distant views of the proposed development, including the uphill and downhill tracks, access track and buildings, are very poor. There is no way that such a development in such a sensitive location should be approved without a far more comprehensive explanation of what it would look like.

8. The planning application is also woefully deficient on its treatment of soil erosion and vegetation damage issues. Construction of a steep access track in such a location, where eroding bare ground is a serious problem, is most inadvisable.
9. In conclusion I again emphasise that this proposed development should not be approved without reference to Scottish ministers. It would seem appropriate that, at the very least, a public inquiry should be held into this proposal and set within the wider context of what is best for Cairn Gorm, as well as the other ski resorts, in both planning and public expenditure aspects. An independent review is urgently needed into future development options. The last occasion that took place on Cairn Gorm was in 1980 when the Lurchers Gully Public Inquiry led to the rejection of proposals for the westward expansion of ski facilities from Coire Cas across the Northern Corries. It is incredible that no subsequent independent investigation has been carried out in the following 50 years of Cairn Gorm development. At the heart of that problem is the ownership of the upper slopes of the mountain, since 1971, by the Highlands and Islands Development Board, followed by HIE. Any public inquiry needs to also address how to correct this ownership problem, either restoring ownership of the whole northern slope of the mountain to Forestry and Land Scotland, or to another public body, such as NatureScot or the CNPA, or to establish a Community Trust to secure responsibility for the development and control of key facilities. This was all explained to the Scottish Parliament's Public Accounts Committee in January 2026, with the main conclusion from witnesses to the effect that the most important next step was the removal of HIE from this mountain.

[redacted]

May 2026

Objection to Planning Application 2026/0135/DET
Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works

I wish to object to this application.

Despite various (reputable) consultants being involved in producing the supporting documents there are numerous omissions and conflicts in the supporting documents. There are also statements made which are not illustrated or fully described. Collectively the supporting documents are not brought together in a cohesive report which should guide the reader through the documents. The result is that any appraisal of exactly what is being proposed in the application very difficult, to the point that I strongly recommend that this application is rejected as not being a competent set of documents to support this application.

Omissions and conflicting information and confusions include:

1. The Proposed Site Plan and Location Plan (produced by Fairhurst): These drawings do not show the relative positioning of the existing ski tow (Day Lodge Poma) and the proposed toboggan ATV track and lifter system. Do the proposed facilities overlap the Day Lodge Poma? Could both facilities operate side by side? If yes, has a safety risk assessment been completed to demonstrate that both facilities can operate side by side, safely?
2. LVA Graphics photomontages (produced by Brindley Associates): All these visualisations do not answer my questions in point 1 above, but underline the confusion on how the Day Lodge Poma and the proposed toboggan facility can operate together. Interestingly, and revealing, the report authors in the body for their main report state on page 16, "The reason for this [the diagrammatic presentation of the track] is that the complexity of the existing ski lift infrastructure and the tonality of the proposed elements results in it being challenging to distinguish the proposals from the baseline condition surrounding the Base Station in Figure 08d". Yes, I agree – that's why a clear detailed drawing of the interrelationship/juxtaposition of the Day Lodge Poma and the proposed toboggan facilities is very necessary along with a safety risk assessment covering how the two facilities could operate together, safely.
3. The Site Layout Plan – Top View (produced by SunKid): This drawing has the appearance of part of a commercial proposal to CMSL for discussion, rather than a document submitted in support of a planning application. It shows suggested and/or optional facilities, and the uphill transport link is just a dashed line. Although it does mark out the bridges for the existing paths, it doesn't show the proposed new pathway at the bottom of the facility which the Fairhurst drawing shows. Are the suggested/optional facilities included in this application or not?
4. The Toboggan Bridge drawings (produced by Fairhurst): I assume that the toboggan would travel over the realigned footpaths, but this is not made fully clear. Also, despite there being elevation drawings of the proposed safety fencing, there are no drawings showing the details of the bridges (construction, materials or layout – just a simplistic sketch. The details of the construction of one of the bridges is given in one of the SunKid drawings, but this drawing does not depict the realigned footpaths. Is the cutaway in both bridges the same, with the same steel pillar heights?
5. Planning & Design Statement (produced by Ryden):
   - This document attempts to bring together all the various supporting documents and drawings, but is too vague and doesn't provide a coherent catalogue and description of the other supporting documents.
   - page 6: states that there will be a 10 metre buffer around the toboggan route, but nowhere is this buffer illustrated or described.
   - page 9: states, that the standalone uplift system will not interfere with the existing ski uplift,

but no mention of the new ATV track.
- page 12: Importantly, the rejected application for a dry ski slope in this same area is not included in the planning history. It should have been, as planning history is not just the granted applications.
- page 14: Mention is made of wider landscape mitigation, including tree planting in the toboggan site area, but no description of what is proposed is included in this application. It is normal for any landscaping proposals to be included in a planning application, and not segregated into another project. A landscaping plan with proposed tree planting needs to be included in this application.
- page 16: Statistics on ticket sales on three other alpine coasters in the UK, which appear encouraging. However, they all emphasise ticket sales in the first year, and there is no information of later years' ticket sales (i.e. for the Welsh and N Ireland alpine coasters). To demonstrate sustainability of this proposed new facility more than just first year ticket sales need to be shown. Also it must be remembered that all these other alpine coaster facilities are sited closer to large centres of population and will have more favourable weather conditions than 700 and over metres in a mountainous area where in about 1 in 3 days the area is in the clouds.
- pages 17-19 Summary of the economic impact (and the separate economic impact assessment report): The methodology used in the assessment by Reference Economic Consultants is fine, however the consultants make it very clear that all their work is based on demand forecasts provided by CMSL, with advice from an unnamed third party. Without authentication of how the figure of over 75,000 rides annually was calculated, the economic impact assessment is invalid and frankly, 'built on shifting sands'. 75,000 annual rides appears to be more than any of the other alpine coasters in operation within the UK, thus this figure needs careful justification. There is also no coherent financial case for this development which given CMSL's track record raises significant questions over sustainability of the proposals.
- For the sake of brevity, I have deliberately omitted from this objection any comments on the compatibility or otherwise of this proposal with NPF4 and the CNPA LDP policies, as I'm aware that other objectors are covering this.

6. Construction Environmental Management Plan (CEMP) (produced by Cnoclee Environmental Services): There are several questions and disconnects with this plan:
- work during the bird nesting season – the Planning & Design Statement says that ecologist surveys should be no more than 48 hrs prior to works commencing, whereas the CEMP states maximum 2 weeks on page 38 Section 14.5, but changes to no more than 48 hrs on page 40 Section 14.10. Which is it?
- vehicle speeds: page 37 Section 14.4 gives a restriction of 10mph, whereas page 44 Section 16.3 sets a limit of 15mph.
- pages 12 & 13 cover an ATV Access Track, but I cannot see anywhere else in the document that the use of this track is described. Conversely, page 11 Section 2 describes access to the top station via existing track network to the Ptarmigan Restaurant. The purpose of this proposed ATV track with all its environmental impact is not covered. Additionally, the environmental impact of a steep (average 1 in 5 slope) track is not covered (erosion etc.). This track appears to not comply with NatureScot guidelines. This is a major issue and should have been described and discussed in some detail in this report.
- many illustrations and appendices are missing from the CEMP.
In all, this CEMP attempts to cover all the bases, but has many inconsistencies and omissions. I appreciate that this document is a 'live' document and will be regularly updated, if the project proceeds, however, a clearer and more accurate document is needed even at this planning application stage.

7. Landscape and Visual Appraisal (produced by Brindley Associates):
   - Section 1.2 mentions a maintenance and emergency access track. Details of this are not adequately covered or not even mentioned in the associated documents (Design & Access Statement, CEMP). A number of drawings show an ATV track running up the side (or over) the Day Lodge Poma. Is this the maintenance and emergency access track? Additionally, there is a Fairhurst drawing of a "Typical Maintenance & Emergency Access Track". Is this the drawing that will be used, or is it just indicative? Again, is this the design to be used for the ATV track? The Fairhurst drawing shows a track 2,000 mm wide, whereas the CEMP says nominally 1.8m wide. What design does the applicant want to submit for approval?
   - Section 1.7 – woodland creation: This is deemed part of a separate initiative and is thus not considered. In any competent Landscape & Visual Appraisal where the proposed development is very visible, the woodland creation and its environmental and visual effects should have been described for this application.
   - Little or no mention is made about the visual impact of the maintenance and emergency access track, especially as the severe slope of this track is very likely to result in erosion, although Fig. 08c shows a simplistic presentation of the line of this track.
8. I do not see any transport assessment as part of this application. If 75,000 rides are predicted annually, then there needs to be details of how existing carking facilities in Coire Cas can cope, especially during the snowsport season when already, in good days, the parking facilities cannot cope.

I appreciate that this is a long list of issues with the supporting documents. I believe that given time, I could discover many more! I repeat, this application in its current form is not in a fit state for assessment by the CNPA Planning Committee. The failings in the supporting documents are so substantial that they should not be covered by planning conditions. The most important issues in this objection are:

- The application does not clearly show how the proposed toboggan facilities operate side by side with the Day Lodge Poma facilities. It is not explained how these facilities can operate together without interference and without a safety risk assessment.
- The description of the Maintenance & Emergency Access Track, its use during construction and afterwards is very unclear. Additionally, it appears that the design of the track will breach NatureScot guidelines on such tracks – level of steepness, lack of bends and susceptibility to erosion. Finally, how will such a track operate in an emergency when the line of the track is the wrong side of the uphill track?
- No transport assessment
- Lack of evidence of the financial sustainability of the proposals – an unsubstantiated economic impact and no business plan.
- The numerous supporting documents have the distinct appearance of being thrown together rather than fully integrating the documents and ensuring that conflicts and omissions are addressed and eliminated.

Yours faithfully

[redacted]

Dr Gordon Bulloch

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ
[redacted]
Scottish Charity No. SC003846
[redacted]
Website bscg.org.uk/

Heather Boswell
CNPA

25 May 2026

Dear Heather Boswell
2026/0135/DET Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works at Land 250M NE of Ranger Base Office, Cairngorm Mountain, Glenmore, Aviemore

I am writing to object to the above planning application for reasons including those set out below, and we request the opportunity to address the committee when the application is considered.

The proposed development would cause loss and degradation of important habitats. Such habitats on the proposed development site include:
Wet Heath habitat that corresponds to the Annex 1 Habitat H4010 and is of major international importance with some 85% of its total global distribution occurring in the UK and Ireland. Conservation of this habitat is an international responsibility.
Mountain Heath habitat of national importance;
Wet Flush habitat of national importance.
Habitats at these altitudes can be considered fragile and already under growing pressures, including from climate change and the nature crisis. These considerations add weight to the importance of applying the precautionary principle.
The consultant in their Ecological Assessment has rightly reported that the nearby legally designated sites are “ecologically connected to the [proposal] site” by wetland habitats and species assemblages. We are concerned that there is insufficient information provided in the application to establish that impacts on the integrity of the nearby designated sites will not be significant.
We are further concerned that there has been insufficient assessment of the cumulative impacts of the present proposal and the multiple recent developments in the ski area involving extensive destruction and damage of natural vegetation and soils, through earth moving, grooming, smoothing, drainage impacts, and damage and disruption to soil structures.

We can find no specific field survey of invertebrates for this proposal. Invertebrates play a pivotal role in ecological webs, and are fundamental to biodiversity at Cairngorm. As well as the proposal impacting invertebrates within and in the vicinity of the development site itself, there are likely to be wider ranging impacts on invertebrates that use a variety of different habitats, for example at different stages in their life cycle. The proposed development site potentially includes the habitat of the extremely rare Springtail *Bourletiella viridescens* for which the first confirmed UK record was from Cairn Gorm in 200

The proposed development is inappropriate in the special and sensitive location of Cairn Gorm. The many developments in the ski area should not be used as a justification for adding to them

with the current proposal and adding to what is becoming an increasingly industrialised area. Cairn Gorm is an outstanding location in the National Park, and as BSCG and others have repeatedly maintained, it should never be treated as a sacrificial mountain. The many developments within the ski area should certainly not be used to back up an argument for further development here.
The proposed development has no particular requirement for snow cover and is not reliant on being situated on Cairn Gorm.
The proposed site has the disadvantages of being exposed and subject to extreme, cold, wet, windy weather; and the coaster would be vulnerable to closure due to the weather.

The proposed development would be visually intrusive and have significant landscape impacts. It would add a particularly unnatural, metallic structure to the mountain side, which in addition would glint when catching the sun; and the two bridges would be particularly visible.

The experience of users of the popular and readily accessed Windy Ridge path, that runs through the proposal site, would be significantly negatively impacted. The path would be crossed twice, by the two bridges of the coaster going over the path; and the path would be impacted by the presence of the toboggan return facility on one side of the path, and the coaster track being on the other side. The proximity of these developments would significantly detract from the mountain experience provided by this route.

The design of the proposed Vehicle Maintenance and Emergency Access Track is not in accordance with NatureScot's 'Guidance on Constructed Tracks in the Uplands' (2nd edition 2013). The gradient of the track appears to be some 20%. NatureScot's guidance states that track gradients should not exceed 14% and points out that “gradients exceeding this threshold in the Scottish uplands are highly prone to severe surface erosion, as runoff velocity accelerates and scours the track material”. There is a neglect of the need for sustainability in a core areaof the np.
The proposed track would be particularly prone to erosion and this is liable to add to its environmental and landscape impacts and habitat degradation.
The proposed track is not in accordance with the National Park Partnership Plan Policy A4f. This states “Conserve and enhance the special landscape qualities of the National Park, with a particular focus on ... f) Applying a presumption against new constructed tracks in open moorland”.
The proposal would be contrary to the aims of the National Park. The development would destroy and damage habitats and their associated species rather than conserving and enhancing natural heritage (1st aim); and the proposed development would not amount to 'sustainable development' due to the environmental unsustainability of the development's natural heritage impacts, as well as its potential lack of financial sustainability (4th aim).
Regrettably, the figures for pricing, costs etc presented in the Economic Impact Assessment on the public planning portal are redacted. This is unhelpful. However, the accounts for Cairngorm Mountain (Scotland) Ltd to Companies House (for year ending 31 March 2025) reveal that the operations at Cairngorm received ongoing public funding of over £2.8 million for that year, or nearly £8000 every day. In the accounts it is explained that public funding provided from HIE “is paid monthly based on cash need … The company is reliant on continuing financial support from its parent undertaking, HIE, to enable it to continue operating and to meet its financial obligations as they fall due” (from 1.2 Going Concern, CMSL Accounts, Companies House).
In light of the amount and necessity of this eye watering public subsidy for the foreseeable future, any net income that may arise from the proposed coaster can be predicted to pale into insignificance.
The wider financial context also undermines any claims that may be made that the financial gains from the proposed development can justify the impacts.

Yours sincerely

Gus Jones
Convener

Tree Planting – We are concerned at the tree planting proposals. The consultant's Ecological Assessment reports that there are already Juniper and Scots Pine on the colder and windier Mountain Heath habitats on the proposal site, with Scots pine saplings recorded throughout this heath habitat. Can create an ecologically incoherent mix of species (as HIE and CMSL and others have unfortunately created at Coire na Ciste); disrupt and damage inherently fragile mountain soils and peat-rich soils, that would both damage the soil structure and biodiversity of the soils and be likely to release carbon.
1) The primary justification for permitting any development at Cairn Gorm, one of the finest and most accessible mountains in the National Park, is its snow cover and that it provides an opportunity for snowsports that is not available elsewhere. Other visitor attractions, such as this coaster, are not appropriate and should be built elsewhere. 2) There is no Financial Business case for the development and no evidence that it meets the Park's statutory aim to deliver sustainable development. 3) The proposed permanent access track alongside the coaster uplift is a) contrary to Policy 4a in the National Park Partnership Plan which states there should be a presumption against new roads on moorland b) contrary to the NatureScots Guidance on Constructed Tracks in the Uplands that says the gradients of tracks should not be more that 14% - the proposed route appears to be 20% and will be highly prone to erosion c) cannot serve its claimed purpose for maintenance and emergency purposes because it is cut off from the downhill coaster track by the uphill track 4) The visualisation points in the LVA do not provide an adequate assessments of its visual impact, omitting close up views of the bridges and failing to consider its visibility in sunny conditions when the rail could gleam and glint. If the CNPA is nevertheless minded to approve the proposal on landscape grounds it should: a) require the metal rail to have a matt finish so it reflects as little light as possible b) require the applicant to produce a detailed woodland plan, including planting, designed to screen the track which it is then legally bound to deliver c) consider alternative solutions to the proposed coaster crossing the footpath by two bridges - these metal bridges will be more prominent than the rest of the track and very difficult to screen with trees

Comments for Planning Application 2026/0135/DET

Application Summary

Application Number: 2026/0135/DET
Address: Land 284M East Of Cairngorm Mountain Glenmore Aviemore
Proposal: Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works
Case Officer: Heather Boswell

Customer Details

Name: Mr Keith Charman
Address: [redacted]

Comment Details

Commenter Type: Member of Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The Cairngorms Campaign objects to this application as follows:
This development is yet another example of an inappropriate structure within the National Park and another move towards the "Disneyfication" of an area of special landscape character. In the Park's own Policy 5 in its Landscape non-statutory guidance document the value of the special landscape quality and the need for its conservation or enhancement is recognised - this application meets neither of those criteria. There is no business case evidence that the social or economic benefits outweigh such a further desecration of the natural environment and the visual impact of the development will be significant - even from a distance. The structure will require permanent access tracks for construction and maintenance and further trackways in the Cairngorm landscape will cause further environmental damage and do not relate to the distinctive characteristics of the landscape quality. The damage to such sensitive areas takes many years to recover.
Keith Charman Director The Cairngorms Campaign

Supplementary Objection to Planning Application 2026/0135/DET

Proposed mountain toboggan track and associated structures, buildings, platforms, landscaping and infrastructure works

This is a supplementary objection to my earlier one dated 25 May 2025 on the planning portal. This supplementary objection takes account of the 46 documents posted after the end of the formal public consultation period.

It is appreciated that significant additional information and updated information has been submitted to support this application. It is regrettable that this information was not made available for the formal public consultation process.

Despite the publishing of these new documents, most of my criticisms and objections still remain. The main objections I have to this application are summarised as follows:

1. **Potential operational conflict between the toboggan facility and the Day Lodge Poma**
   A refurbished snow fence between the Day Lodge Poma line and the toboggan uplift track is now being proposed. However, the boundaries of the existing Day Lodge Poma run are not clearly shown on any drawing. In fact, it would appear that the proposed ATV track would overlay the Poma run on parts of the Poma run. This produces a safety conflict unless the toboggan is not in operation whilst the Poma is in operation. Additionally, if the Poma and ATV track overlay each other even in part, this will compromise the use of the Poma, unless the ATV track is kept snow covered when the Poma is in use. (Fairhurst Dwg 400858-PC-1000 dated 04-02-2026 refers). I cannot find any clear justification within the supporting documents as to why the ATV track is needed.
2. **ATV track design**
   The design of this track is not clear. The potential conflict between the line of the ATV track and the Day Lodge Poma is covered in point 1 above. The simplistic plan of the ATV track shows a track which is almost straight (only a few very minor kicks). The average gradient is about 1:5. This design breaches:
   - The NatureScot guidelines for the design of such tracks as there will be a severe erosion risk on such a track with this average gradient. It is disappointing that the NatureScot response as a Statutory Consultant does not mention this design problem.
   - The HIE guidance document "Working with the Environment at Cairngorm", states, "Construction of proposed new tracks must be guided by SNH's Constructed Tracks in the Scottish Uplands (LUC, 2005; second revised edition, SNH, 2013), which contains much information on issues and techniques". It is clear that this proposed ATV does not meet this guidance, despite the use of the word "must". So, CMSL as the applicant, is in breach of its owner's guidance.
3. **ATV track visualisations**
   The revised visualisations produced by Brindley Associates do not present the full visual impact of the ATV track. In fact, the visualisations mainly just partially show the line of the track and not its visual impact. I appreciate that there are numerous other tracks in Coire Cas, but that should not justify adding to this by adding another scar up a hillside that has been until now relatively untouched. CNPA Planning should recall that application 2018/0177/DET for installation of a dry ski slope was overwhelmingly rejected because of the negative visual impact of the proposal. This ATV track is on the same hillside as the rejected dry ski slope, but as the track is higher up the hillside it has potentially even wider visual impact than the dry ski slope. I note that the CNPA Landscape Officer has been

persuaded to reduce her concerns over the visual impact and other landscape matters concerning this application. It is regrettable that the same opportunity has not been allowed for the several public objections to this application. For such controversial planning applications, CNPA should insist on the applicant undertaking a public consultation. Will CNPA take this as a learning point?

4. **Mitigation Tree Planting**
   The additional documents did at least provide descriptions of the proposed tree planting plan around the proposed toboggan run. However, the documents do not make clear that montane tree regeneration is already occurring (photos taken in September 2026 can be provided as evidence of this natural regeneration). The new photomontages attempt to provide a visualisation of the effect of the additional tree planting after 10 years. However, no account is given for the significant effect of natural regeneration on the surrounding landscape after 10 years. The need for this additional tree planting (using public money) has not been justified as it would seem the significant effect of natural regeneration has been ignored.
5. **Viability of the project**
   I raised this issue in my original objection, but nothing in the additional supporting documents changes any of the flimsy data presented on the viability of the toboggan run in the Planning & Design Statement. Given the many inflated financial statements made by HIE and/or CMSL included in many previous planning applications over the years, the flimsy economic impact data in this application needs to be questioned.
6. **Discrepancies and lack of clarity**
   Despite pointing out errors and discrepancies in my original objection, most of these remain, plus a few more. These include:
   - The Planning & Design Statement should have been updated to include references to the additional supporting documents. The statement in response to public representations produced by Ryden is inadequate in achieving this.
   - New photomontages and visualisations were added, but reference is only made to them in the Rebuttal Letter produced by Brindley Associates. The original Landscape and Visual Appraisal Report should have been updated to include these updates and effectively describe them.
   - The additional documents of Habitat Management Plan and National Vegetation Classification Survey produced by Envirocentre should have been better integrated and cross referenced rather than being self-standing documents.
   - The revised CEMP still retains the discrepancies I highlighted in my original objection. Additionally, the revised CEMP states that it is not aware of any GWDTEs on the site, despite the National Vegetation Classification Survey identifying several of these on the site.
   - Altogether a rather shoddy collection of supporting documents which demonstrate a lack of checking and integration.

These reasons for objection make clear that this application should be rejected by the CNPA Planing Committee.

Yours faithfully,



Dr Gordon Bulloch