

## Objection to Planning Application -'Engineering works for strengthening funicular viaduct'

I am objecting on the following bases, I shall expand on points 2 & 3 further through this document:

- Firstly, that this application should be rejected without further consideration because the application is incomplete. It does not include details of the access tracks required and the designated areas identified as needing planning permission do not cover the full site that will be affected.
- 2. The stated economic case for repairing the funicular does not exist, the applicant has not provided any evidence in support of these claims.
- 3. Thirdly, that the repair of the Funicular Railway is incompatible with objectives B, D, F and G of the CNPA Working Principles for CairnGorm Mountain approved by the CNPA Board on 29th March 2019.
- 4. Finally, the monolithic nature of the Funicular viaduct requires that it will eventually have to be removed entirely. Propping up the viaduct now is a £10m plus can kicking exercise, not merely delaying the inevitable but substantially increasing the extent of the ground disturbance required to ultimately remove the viaduct.

As stated in the supporting documentation, the Funicular is not currently operational and will not operate again unless repaired.

5.1. The funicular viaduct, a significant structure in the landscape, already exists.

The Funicular doesn't and won't exist in an operational sense without the proposed repairs. Removal of the Funicular viaduct will very substantially reduce the visual intrusion of the snowsports area from the wider Strath, thus significantly improving the landscape qualities of CairnGorm Mountain, while improving snow holding of the signature White Lady Run and allowing more appropriate uplift to be installed.

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## An economic case for repairing the Funicular?

From reading the supporting documentation, this application to repair the funicular rests on the claimed economic importance of the funicular and the already substantial visual impact of the funicular viaduct.

Supporting Statement has the following paragraphs:

4.1 The operation of the Funicular delivers a significant economic contribution to the local and regional economy, and it is essential in providing all-season access and accessibility to Cairn Gorm.

5.1 The funicular viaduct, a significant structure in the landscape, already exists. The planning application is for works to strengthen the funicular viaduct and to ensure its return to operation as an important part of the local economy.

Economic viability of the Funicular

In the Guardian on Wednesday 28th April 1999, David Hayes from Landmark Forest Adventure Park is quoted:

"The project is without any doubt, commercially unviable."

21 Years later HIE is unable to provide evidence to refute that claim in support of this planning application. I suspect that the reason for this omission is that quite simply no such evidence exists.

With hindsight it is difficult not to concur with David Hayes statement because:

- CairnGorm Mountain Limited accumulated £2.753 million of losses during the period the Funicular and the current Ptarmigan Restaurant were both in full operation.
- CairnGorm Mountain's operator was twice taken into public ownership by HIE in 2008 (to stave off a formal insolvency) and in 2018 (after entering administration).

David Pattison (former head of the Scottish Tourist Board) projected the non ski season visitor numbers for the Funicular would be between 77,000 to 104,000 and thus be 50,000 below the breakeven point of viability for the Funicular.



These projections strongly backed up David Hayes assertion in a letter published in the Press and Journal in May 1996 that the funicular project would be "risking the viability of the Cairngorm Chairlift Company as a whole".

On 17th September 2004, then CairnGorm Mountain Ltd CEO Bob Kinnaird wrote to season pass holders in a letter formalising the 'core lifts policy'. This letter heralded the success of the Funicular, and strongly implied that CML was able to provide snowsports as a service off the strength of the funicular.

Many skiers and snowboarders had long suspected the reverse was true, that snowsports was subsidising year round operation of the Funicular as a tourist attraction, to the severe detriment of the snowsports operation.

When Natural Assets Investments Limited decided to change CML's financial year from the fiscal year to the calendar year, CML posted a shortened accounting period covering April to Dec 2015, basically an unique insight to the financial reality of CML in summer with the funicular operational. Over the 'summer' trading period in 2015 CML posted a loss of £1.248 million!

Jannete Janson, then General Manager of CML under Natural Retreats affirmed what many skiers had long thought, "...our winter revenue which is crucial to sustain the operation during the summer months."

It is clear that funicular railway is not the economic success and importance that HIE proclaim in the supporting statement, rather the funicular has been a financial millstone around the neck of CML that has directly contributed to the run down and derelict nature of the built environment on CairnGorm. Does the Funicular Support the Wider Economy?

The Supporting Statement's conclusion starts with the following paragraph:

6.1 The CairnGorm Mountain Funicular has contributed significantly, during the past two decades, to a sustainable economy in Aviemore and the Spey Valley, and to the Highlands in general. It has helped extend visitor numbers and economic activity beyond the core tourist season and assist in the aspirations for a more viable year round economy.

This is a bold statement, but like those in paragraphs 4.1 and 5.1 no evidence is provided to back the claim up.

In the Park Authority's own 'Local Development Plan 2020 evidence paper' the CNPA notes that there has been a 13.4% increase in visitors to the national park between 2009 and 2016. However over the same period non-snowsports **funicular usage actually declined by 3%**. (Annual non ski trips fell from 142,039 to 137,776)

During Summer the Ptarmigan is in Cloud 1 day in 3

A survey of the Loch Morlich Winterhighland webcam at 1pm during the months of May to September in 2013, 2014 and 2015 indicate that even during the core summer trading months the Ptarmigan Restaurant at the top of the Funicular Railway is in cloud 1 day in 3 on average.

This contrasts to the Base Station being in cloud an average of just 1 day in 35. This suggests that the Ptarmigan is too high up the mountain to optimise the potential of CairnGorm for paid sightseeing.

Restoring the Funicular status quo will thus significantly limit the potential economic benefit of investing in CairnGorm compared to a variety of potential alternative approaches at a lower elevation on the mountain. Increasing the size of the Ptarmigan Restaurant will do nothing to address the lack of view and resultant lack of appeal on days when the building is inside a cloud.

## CairnGorm Mountain - CNPA Working Principles

Approval of this application to repair the Funicular Railway viaduct would be contrary to points B, D, F and G of the working principles agreed by the CNPA Board on 29th March 2019.

B) Any proposals should be part of a masterplan for the ski area as per the proposed new Local Development Plan.

HIE have consultants working on a Master Plan for CairnGorm Mountain, who undertook a number of public engagement events during the winter season.

This planning application completely prejudices the purported Master Planning / consultation process on the future of CairnGorm by seeking to railroad through fixing of the Funicular as a fait accompli.

A similar scenario occurred with HIE prejudicing the uplift review by the SE Group, by demolishing the Coire na Ciste Chairlifts in early autumn 2017, after the terms of reference for the uplift review were published but before the SE Group were contracted in January 2018.

At the time of writing this objection statement, a further planning application from HIE for CairnGorm Mountain has been lodged seeking to install automatic barriers to enforce carpark charging in Coire Cas.

The supporting statement for that application lists no less than 7 planning applications (2 lodged and 5 in the pipeline) for CairnGorm.

This scattergun approach is wholly unacceptable and completely incompatible with reference to the CNPA Board's requirement for a widely consulted and agreed CairnGorm Masterplan to be in place.

The credibility of the CNPA as a planning authority is on the line with HIE's behaviour and the planning committee must uphold the published working principles or risk completely losing control of the situation on CairnGorm and undermining the new Local Development Plan.

D) CairnGorm Mountain should provide a good Scottish ski experience with facilities and uplift commensurate with scale.

Scottish Snowsports is due to our maritime climate opportunistic in nature.

This holds true for both for the skiers and snowboarders themselves, but equally resort operators too must be in a position to make the most of the opportunities when good conditions prevail.

Given our climatic conditions and location, wind is an issue for all five commercial Scottish Snowsports areas, but an additional factor is in play on CairnGorm. The propensity for strong katabatic winds blowing downslope off the plateau means that even in relatively benign synoptics, strong winds and substantial drifting can occur.

Winds from the Southerly quadrant can be amplified hugely by a combination of katabatic and topographic wind acceleration, with severe ground drifting shifting large quantities of snow from higher elevations on to both the ski road into Coire Cas and over the Funicular viaduct.



Staff digging out funicular running gear by hand during the afternoon of Sun 16th Feb 2014.



Superb Half Term conditions and weather but Funicular out of service leading to larger queues on surface tows and no lift served sightseeing.

The Funicular was in part predicated on being able to uplift skiers to the Ptarmigan in 70mph winds, but improved weather forecasting and information dissemination vs 20 years ago negates that requirement. People are more choosy when to travel (and where to travel), the critical factor to providing a good experience (in line with the CNPA working principle D) and commercial success is being to open in a timely manner once the storm abates.

Once the wind has gone a chairlift and gondola can be opened quickly, whereas the Funicular is frequently delayed or doesn't open at all after significant snow storms. The unfortunate paradox is that the more fresh snow and thus better conditions are, the bigger the drift problems with the funicular and the longer it is out of action.

The funicular's ability to operate in higher winds vs chairlifts / gondolas is often overstated as with regards CairnGorm this debate is frequently framed in terms of the 25mph operating limit which was applied to the White Lady Chairlift.

Whereas the Glencoe Access Chairlift which itself is 10 years older than the Funicular has an uplift limit of 50mph across the line. A modern high speed 6 seat detachable chairlift would, with good tower positioning on a sensible alignment, be able to exceed the wind tolerance of the Access Chairlift, to around 60mph.

A good experience for both snowsports and sightseeing customers, and economic viability of the operator, requires that the lift in question is able to operate reliably when snow conditions are good. Demand for both snowsports and winter sightseeing will be higher in periods of good snow cover - the lift companies need 'to make hay when the sunshines'!

Funicular vs Nevis Range Gondola & Glencoe Access Chair

The February Half Term period is a critical juncture in determining the commercial success or otherwise of the season. Assessing the performance of the CairnGorm Funicular against the Nevis Range Gondola and Glencoe Access Chairlift for the last 10 seasons of Funicular operation is insightful.

Days of operation in the month of February by year				
	CairnGorm	Nevis Range	Glencoe	
Year	Funicular	Gondola	Access Chair	
2009	21	25	22	
2010	22	27	24	
2011	20	25	24	
2012	25	24	21	
2013	23	25	25	
2014	4	22	21	
2015	20	22	25	
2016	21	20	22	
2017	18	22	24	
2018	<u>23</u>	<u>25</u>	<u>24</u>	
Accumulated	197	237	232	
Average Open	19.7	23.7	23.2	
Days CLOSED	85	45	50	
Avg Days LOST	8.5	4.5	5	

While the Funicular can operate in higher wind speeds than the other two lifts, the other factors which affect its operation more than negate the windspeed advantage. The Funicular loses nearly twice as many Feb days on average as the Gondola.

In their report to HIE in 2018, SE Group noted that the funicular can not in practice match its nominal 1200 persons per hour capacity. That requires a departure at the full 120 person car capacity every 6 minutes, the shortest permissible journey time is 4 minutes which leaves only 2 minutes for unloading and loading of the cars.

Operational reality is load times are around 6 minutes and to keep turnarounds from considerably exceeding that only 100 passengers are usually loaded (the 120 capacity is impractical when majority are skiers / snowboarders). Even with a 4 minute journey time, that means only 6 departures an hour are achieved giving a practical max capacity of just 600 passengers per hour.

The mid-station not being at the mid point of the track requires a double stop, this effectively limits the funicular to one uplift every 15minutes when mid-stopping which reduces the theoretical capacity to 480 per hour, and applying the same criteria of loading only 100 per car means in practice only 400 an hour get uplifted to the Ptarmigan (and only 200 an hour from each station, a figure that is only a THIRD of the 600 passengers per hour that both the White Lady and Carpark Chairlifts were individually capable of).

The Funicular Railway is dysfunctional in winter, it is low capacity, high cost and sucks up a dissporopinate amount of staff time / resources dealing with track burials and burial of the tunnel entrance. This has knock on effects delaying opening of other tows and terrain which only serves to further degrade the snowsports customer's experience.

Repairing the Funicular Railway is thus contrary to the CNPAs working principle D that "CairnGorm Mountain should provide a good Scottish ski experience with facilities and uplift commensurate with scale." F) Summer visitors should be provided with an opportunity to enjoy the mountain environment and be close to nature and wildness.

In comparison to the setup at Nevis Range and Glencoe, CairnGorm with an operational funicular falls well short of meeting the objective of working principle F.

Sightseers are conveyed from one internal station to another by enclosed funicular carriage from which only a modest proportion of passengers get a clear and unobstructed view from. To arrive at a Top Station from which there is no exit and is all too frequently inside a cloud.

Both the Funicular and closed system at the Ptarmigan isolates summer visitors from the mountain environment and provides a poor visitor experience. While a gondola is also enclosed, families and groups can travel as individual groups in their own cabin, all having unrestricted views from a higher vantage point.



Arguably the sense of both wild land and of transition from forest to mountain plateau would be greater in Coire na Ciste, and superb views which are less often obscured by cloud are available at lower elevations.

The dropped proposal to build a boardwalk above the Funicular Tunnel to a viewing platform was an admission by CML that the Ptarmigan Restaurant (while usefully situated for snowsports customers) is actually too high up the mountain to give a consistently good visitor experience to sightseers, being in cloud 1 day in 3.

Expanding the Ptarmigan as per the previously approved planning application does little to address the shortcomings of the Ptarmigan in terms of appeal to sightseers, particularly repeat visitors who are essential to economic viability.



The closed system at the top and loss of egress at mid-station particularly affected less physically able bird watchers who were unlikely to venture far but previously used the Chairlifts.

The issue of winter congestion in the Ptarmigan building could more effectively be addressed at less cost and provide a better overall visitor experience by re-establishing the Shieling Restaurant.

In the event the Funicular does re-open, year round use of a new Shieling and funicular passenger egress and entry from the mid-station level would at least in part mitigate the Funicular's shortcomings as a summer sightseeing attraction and assist with meeting objective F.

G) The operational model for CairnGorm Mountain needs to be fit for purpose and affordable in the long-term.

The Funicular Railway from publically available evidence (see pages 2 to 4) would fail to meet this criteria even if it was currently operational, far less facing a repair bill of upwards of £10million to return to operation.

In total over 2/3rds of the piers are in need of strengthening including every pier situated above mid-station, which represents 2/3rds of total requiring remedial works. Thus 2/3rds of the work is required where drifting issues are most prevalent.



There is lack of detail in the planning application about the exact form and function of the pier props, this raises the following concerns:

- Though the scale of the props are modest compared to the viaduct as a whole, they will act to increase snow accumulation problems for the funicular.
- That will further impact operational reliability of the funicular and increase resources required to open the lift in good snow cover.

- No evidence is provided that the props and anchors will themselves will not require interventions due to slope creep and downhill pressure of deep snowpack accumulations.
- The props themselves will require to be monitored and maintained, adding to the operating costs of the funicular which was already unviable as a visitor attraction.
- There is no clarity over the proposed lifespan of the proposed repair or whether it will allow the funicular to be returned to full capacity operation.
- No explanation as to how frequently the props will need to be monitored. If they require regular inspections throughout the year, this could render the Funicular inoperable during periods of good snow conditions.

It is clear that given the poor condition of the Funicular viaduct at only 20 years of age combined with the additional structural supports that to a greater or lesser extent the Funicular will henceforth incur ongoing higher upkeep costs than had been expected.

In all likelihood the maintenance and operating costs of the funicular will continue to rise making it ever less viable. Such a scenario being unsustainable was the exact reason given for ruling out long term operation of the Carpark and White Lady Chairlifts as means of linking a new Base and Ptarmigan Station - the do minimum uplift option that was considered as the only alternative to building the funicular.

Given lack of clarity in the application and other points raised in this document, this planning application is not compatible with the working principle that 'the operational model for CairnGorm Mountain needs to be fit for purpose and affordable in the long term' as the Funicular is almost certain to require ongoing public subsidy or will continue to undermine the viability of the snowsports area, to the detriment of national park.

## Conclusion

Repairing the Funicular will result in ground disturbance to at least 4 times as many sites in the White Lady corridor as installation of a new overhead lift on broadly similar alignment to either the former White Lady Chairlift or T-bar.

More pertinently in planning terms, if the proposed repairs go ahead it will result in greatly increased ground disturbance, difficulty and inflated final costs of the ultimate removal of the failing Funicular viaduct.

This planning application is incomplete, its existence means the applicant HIE has prejudged the Master Planning process currently under way. Restoration of the Funicular Railway to service as per this application is incompatible with CNPA working principes D, F and G, while the fact this application (and others) exist without an approved Master Plan is incompatible with working principle B and thus undermines the whole set of working principles and the CNPA as planning authority.

For all the reasons outlined above, this planning application should be refused.

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