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Ms Lucy Prins Planning & Building Standards The Highland Council Charles Kennedy Building **Achintore Road** Fort William PH33 6RQ

7th November 2018

Dear Ms Prins

Proposal to construct and operate a run-of-river Hydro scheme on the Allt Daim (Scheme 2), Land 2460M SE Of Aonach Mor House, 9 Forestry Houses, Torlundy, Fort William PH33 6SW Planning Reference: 18/04646/FUL

Mountaineering Scotland has assessed the proposal, for its operational phase, in terms of its likely effect upon mountain assets and mountaineering activities. We have concerns about the impact of this major civil engineering project in a sensitive upland location.

Mountaineering Scotland is a membership organisation with over 13,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains, and acts to represent, support and promote Scottish mountaineering. Mountaineering Scotland also acts on behalf of the 80,000 members of the British Mountaineering Council (BMC) on matters related to landscape and access in Scotland, and provides training and information to mountain users to promote safety, self-reliance and the enjoyment of our mountain environment.

Visual Impact of construction access tracks, intake weir and penstock route.

Mountaineering Scotland recognises that development activities will have impacts and accepts and encourages developments that work with the grain of nature and maintain the wild qualities of the landscape. This assessment should be read in the context of this being an analysis from a mountaineering perspective.

We have accepted many renewable energy developments in the Scottish hill country but are becoming increasingly concerned by the residual visual impacts of small hydro schemes throughout Scotland. This is generally from the alignment of penstock and construction access tracks and the detail and quality of post construction restoration. We are especially concerned where these proposals lie within areas of high landscape quality and where they are close to popular hillwalking and climbing areas.

Where proposals are located just outside of a designated landscape area, we would expect an assessment of potential impacts on landscape character and visual amenity of the designated landscape. The visual effect of developments on the periphery of the boundary may affect the baseline characteristics of the scenic or wild land qualities of the designated area. Wild land is a finite resource and if the qualities are reduced it may take decades to recover.

This view is endorsed in the Highland-wide Development Plan p155 where wild areas are regarded as a feature of local/regional significance. We would rate this higher as the National Planning Framework 3 in section 4.4 states: "We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset."

We note that the Allt Daim intake weir is located in the glen below the gondola and skiing routes. We ask The Highland Council to ensure that this proposal does not detract from the wild qualities of the location in which it is set, specifically the intake weir and associated infrastructure that lies beyond the existing downstream river diversion infrastructure.

We note that the Environmental Report, in the section on Intake Construction, states that the ground around the intake would be restored to match a pre-construction state, with natural stone used to protect the structure. We ask The Highland Council to give protection to the landscape by stipulating in planning conditions that no bare concrete surfaces will be exposed, and will be faced with local stone, cobbles and turves. Intake infrastructure can stand prominent and obvious in a natural highland landscape, and conditions that mitigate the visual effect of metal railings and pipework would be beneficial.

We ask that The Highland Council ensure that all construction tracks are removed and the penstock route restored in line with the Environmental Report restoration proposals. The assumption in the Environmental Report is that restoration will leave no trace after a few years.

It would be helpful if monitoring visits are specified and that reinstatement be completed within a stated timescale. Restriction on the use of atvs for maintenance visits would be a welcome stipulation in planning conditions.

Yours sincerely

Sturt Yourie

Stuart Younie

CEO, Mountaineering Scotland