



The Mountaineering Council of Scotland

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Dear Sir

15/00258/FUL

EIA application for installation of 2 MW hydro-electric scheme on land east of Allt Airdeasaidh, Ardessie, Dundonnell

Objection by the Mountaineering Council of Scotland

1. Introduction

DHG Hydro has applied for planning permission for a hydro scheme and access track on steeply sloping moorland above Loch Broom.

The Mountaineering Council of Scotland has considered the proposed development very carefully. The proposed development would have medium-term landscape and visual impacts from construction activities and long-term landscape and visual impacts, particularly from the permanent access road. We believe that these impacts could be managed acceptably provided the construction is carried out sensitively, restoration of disturbed ground is successful, and there is appropriate long term aftercare.

However, based on a survey of wind farm and hydro construction and restoration undertaken for SNH (July 2014) and our own observations around the country, we have no confidence that this would be achieved.

The MCofS therefore objects to the proposed development for its adverse landscape and visual impact. This objection would not be sustained if we could be assured that the highest quality of construction, restoration and ongoing maintenance would be in place and independently monitored (e.g. by THC or, preferably, SNH).

2. The Mountaineering Council of Scotland (MCofS)

The MCofS is an independent organisation with more than 12,500 members who are hill walkers, climbers and ski tourists. It was established in 1970 as the national representative body for the sport of mountaineering in Scotland. We are recognised by the Scottish Government as representing the interests of mountaineers living in Scotland.

We also act in Scotland for the 75,000 members of the British Mountaineering Council (BMC), which fully supports our landscape policy and contributes direct financial support to our policy work.

The MCoFS recognises the need to move to a low carbon economy but it does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes.

3. Summary

The MCoFS believes that the proposed site has the capacity to support a commercial hydro-electric development of the kind proposed. However, it is a sensitive location and were the scheme to be poorly constructed, unsatisfactorily restored, or ill-maintained over its long lifetime it would cause significant and unacceptable harm to local mountaineering assets. Since we believe this is likely to be the case, we formally object to the scheme proceeding.

We would be reassured if the developers were to commit to, and be held to, following the highest standards in construction, restoration and maintenance. This could be ensured by attaching appropriate conditions to the planning consent, and by a long-term programme of independent assessment to ensure that these are adhered to and that restoration and maintenance outcomes achieved successfully and sustained over the long term.

4. Material considerations

a) Location and landscape setting

The proposed development lies close to significant mountain assets, within a National Scenic Area and largely within a Wild Land Area and Site of Special Scientific Interest. It sits on the lower northern slopes of An Teallach, from which it is not visible except from the extreme ends of unfrequented western ridges. It is immediately northeast of the Corbett Sail Mhor, with the proposed hydro access track likely to become walkers' main approach route, and the scheme overlooked from the upper slopes of the hill at a distance of around 1km. It is approximately 5km south of the Graham Beinn Ghobhlach (not a Corbett as the LVIA mistakenly repeatedly states) and its outlier Cnoc a' Bhaid-rallaich, from both of which it is visible, looking straight across Little Loch Broom down towards the access track ascending steep slopes.

The mountain experience in Scotland is closely connected with the wild land character of the landscapes in which most mountains are located. The proposed site lies on the fringes of a Wild Land Area and an SSSI, and within a National Scenic Area. Nevertheless, if the proposed scheme could be constructed and maintained to the highest standards, the MCoFS would not regard it as incompatible in principle with these designations.

b) Visual impact

We concur with the LVIA in the ES except for its conclusion on the visual impact of reduced water flow in the Allt Airdeasaidh, which we consider below. We also concur with its caveats that its conclusions depend upon the assumption that there would be 'best practice' environmental management during construction and restoration, effective restoration of disturbed ground (including the existing ATV track where it is not followed by the new track), and appropriate ongoing monitoring and maintenance.

The developer follows SEPA guidance on assessing the magnitude of visual impact due to changed water flows in the Allt Airdeasaidh. On this basis the impact would be classed as 'very small'. This suggests to us that the guidance tool is insufficiently sensitive to change. Full and high flows will be reduced from 109 days per year under natural flow to 34 days a year under the proposed abstraction scheme. This reduces the odds of encountering the waterfalls at their most spectacular on any random day from 3 in 10 to just under 1 in 10. We regard that as an appreciable change. While we recognise that the falls are still a fine feature at medium flows, which will increase by the amount that full/high flows decrease, the spectacle of the falls in full voice will be much more infrequent.

Our principal concern with the scheme is the visual impact of the proposed access track. This ascends steep and visually open slopes. We do acknowledge the benefit of creating a single firm track and reinstating the existing poorly constructed and braided ATV track and walkers' routes. Mitigation measures, e.g. downhill bunds, are proposed in the ES and should help reduce the impact seen from below.

However, views from Sail Mhor and from the hills north of Little Loch Broom will be downwards onto the access track. The surface finish is therefore an important consideration in minimising visual impact. It is proposed to narrow the construction track to a 2.5m permanent track and to turf the centre of this track. It would also help if the material surfacing the track was as dark as possible. The photomontage from Viewpoint 12 shows a very dark track surface and it is immediately obvious that this minimises its visual impact. We are not sure if this photomontage is realistic or using artistic licence. As the LVIA states regarding Sail Mhor (and the same applies to Beinn Ghobhlach): "Whether the track is visually intrusive would depend on the success of restoration of disturbed ground, the sensitivity of its alignment and colour of surface." (Para 433)

We further concur with the LVIA that "There should be trials of the proposed track finish using local stone to check its appearance and visual impact. Further measures to reduce visual impact could include providing a shallow layer of soil / peat over the constructed track, or along the centre of the track to encourage vegetation establishment on the track to soften the visual impact." (Para 543)

It is not clear why the access track does not follow the pipeline route from the pipeline bridge to the intake. Ground (peat) conditions may preclude it. There may also be a benefit anticipated from reduced future ATV erosion by continuing the route on the east bank. However, the visual impact of a track in the valley and a dark timber vehicle bridge would be less than the impact of the proposed route on a high bank with a steep descent to the intake.

c) Access

The MCofS appreciates the need for construction activity to have due regard to both operator and public safety. We welcome the developer's intention to maintain pedestrian access at all times during construction. Our experience has been that, with good information and signage accompanied by goodwill and common-sense on the ground, construction activities are not incompatible with public access.

It is likely that some walkers would find the proposed pipe bridge footbridge beneficial. This may create an erosion risk where footfall is concentrated at either end of the bridge. Ground restoration here should use materials sufficiently robust to resist trampling.

6. Conclusion

Although the proposed development raises concerns, mostly with respect to its visual impact, the MCofS believes that a scheme could be successfully constructed if done carefully enough. The LVIA concludes that "The assessment is based on sensitive construction, effective site management and successful restoration." (Para 554)

It is evident by looking at sites across Scotland that the quality of each of these stages is highly variable and often barely adequate, especially in terms of restoration and aftercare.

For this reason we can have no faith that what is proposed for this scheme, which sounds not unreasonable on paper, will be delivered in practice at this sensitive location.

We therefore object to the proposal.

If consent is given, then it is essential that the developers commit to, and are held to, the highest standards in construction, restoration and maintenance.

This should be ensured by attaching appropriate conditions to the planning consent and by a programme of independent checking to guarantee that these are adhered to and restoration and maintenance outcomes achieved successfully and sustained over the long term.

Yours sincerely

David Gibson
Chief Officer