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Councillor Margaret Davidson
Leader
The Highland Council
Glenurquhart Road
Inverness
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28 February 2019

Cc Councillor Bill Lobban
Convenor

Dear Councillor Davidson

Glen Etive hydropower planning proposals

I am writing to express our concerns about the planning applications for the seven small-scale hydropower schemes proposed for Glen Etive, recently approved by the South Planning Committee.

We are encouraged that the process of assessment is still ongoing with an amendment lodged to allow the Council the opportunity to re-consider and reverse the decisions made on three of the schemes: Allt Ceitlein, Allt Chaorin and Allt Mheuran. We urge The Highland Council to reverse the decision to approve these three schemes and protect this sensitive area from the cumulative impact of intrusive engineering developments.

Mountaineering Scotland is a membership organisation with over 14,000 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.

The development application has rightly attracted a huge amount of attention from the climbing and hillwalking community and the response from the mountaineering community is based on our experience of the post-construction reinstatement of landscapes from other hydropower schemes.

From the correspondence we receive the evidence on the ground strongly suggests that restoration and mitigation proposals, and also the enforcement of planning conditions, has, in most cases, failed to minimise the impact of scraping a road through the landscape and has not returned the landform back to its original state.

The specific reasons for our concern with these proposals in Glen Etive may be summarised as:

Impact of renewable energy generation

It is important to emphasise that we are not against renewable energy. We appreciate the fact that some development is necessary and is acceptable in the landscape. We have not objected to all seven hydropower schemes in Glen Etive, only the three that encroach upon the wild qualities of the landscape in the Wild Land Area.

Our members enjoy being in the mountains, and they are well aware of the impact of climate change on the uplands. We support the approach to greening our energy infrastructure but we believe this should not be at the expense of our internationally renowned landscapes.

The point has been reached in Glen Etive, where the cumulative impact from seven major civil engineering projects, (three of which encroach into a designated Wild Land Area) will impact negatively on the value of a landscape which is a significant attraction for tourists and visitors, and this outweighs the benefits from the energy generated by the three proposals. We believe it is necessary to weigh up the national interest between energy generation and preserving the integrity of our internationally-important landscapes.

Landscape significance

You will be aware that this area carries Scotland's highest landscape accolade in that it is in a National Scenic Area, and in addition, three of the proposed schemes lie within a Wild Land Area, the landscape qualities of which are generally promoted as a huge draw for visitors to appreciate. This is a national asset, the glen being readily accessible from the A82 for many visitors, but yet retaining a sense of remoteness within a scenic and wild landscape. The views into and from the glen, and the experience of a lightly-touched landscape are easily damaged. The designation of National Scenic Area, coupled with recognition of quality by the Wild Land Area status indicates that this is one of Scotland's top landscapes.

Planning Policy

Scottish Planning Policy states that that areas of wild land are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. It goes on to suggest that development may be appropriate in some circumstances. It is the circumstances here that are critical as the cumulative impact is a significant feature.

NPF3 states: "We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset." As we indicated above, assessment of the value of each of these schemes on their cumulative impact in a nationally important asset is a vital aspect of further consideration. SPP at paragraph 212 offers the protection through National Scenic Area status.

This aspect of national importance is crucial, and we have written to the Chief Planner for the Scottish Government, bringing to their attention the importance of this decision by The Highland Council.

The key test of suitability is whether the construction access roads, 4 metres wide, cut into a steep and undulating landscape, can ever be reinstated to what they were prior to construction. It is easy to assert landform reinstatement will be done. It is a real-life test that is required here, based on previous experience that The Highland Council has from approximately 300 hydropower schemes, and other hill roads constructed under the General Permitted Development Order.

Recreational importance

The hills and side glens are regarded as an outstanding mountainous landscape not only in Scotland, but in a UK context, bringing many mountaineers and hillwalkers to Glen Etive to experience the sense of openness, challenge and enjoyment. The area under consideration is part of the whole range of mountains, including Glen Coe, that are recognised as a special place for public enjoyment. Not only for hillwalking and rock-climbing, the landscape setting provides an outstanding resource for canoeing in Scotland, and also for more passive enjoyment of the grand views which tourists and visitors to the glen come to enjoy.

In conclusion, we welcome the motion to re-evaluate the decision by the South Planning Committee on the three hydropower schemes that lie in the Wild land Area, and trust that Councillors will recognise the

national significance of this landscape, weighed against the opportunities for development in less sensitive areas. We contend that Allt Ceitlein, Allt Chaorin and Allt Mheuran are not the right locations, and request that the decision by the South Planning Committee to approve the hydro schemes be revoked in the national interest.

Yours sincerely

A handwritten signature in black ink, reading "Stuart Younie". The signature is written in a cursive, flowing style.

Stuart Younie
CEO, Mountaineering Scotland