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Ms A. Knox,
Planning & Building Standards
Argyll and Bute Council,
Kilmory,
Lochgilphead,
Argyll,
PA31 8RT

5 September 2018

Dear Ms Knox

**Construction of run-of-river hydro scheme: Land North And East Of Glenkinglas Lodge Glenkinglas Taynuilt Argyll And Bute.
Planning Reference: 18/01259/PP**

Mountaineering Scotland **objects** to this run-of-river hydropower proposal because of the cumulative visual impact of constructed tracks within Wild Land Area 09 – Loch Etive Mountains, the Area of Panoramic Quality, and as experienced by hillwalkers accessing nearby hilltops.

Mountaineering Scotland is a membership organisation with over 13,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and skitourers 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

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.

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.

The location where this proposal is situated lies within a part of Scotland recognised at multiple levels for its landscape quality. The proposed development lies within the Loch Etive Mountains Wild Land Area, and also within an Area of Panoramic Quality as identified

by Argyll & Bute Council. It lies close to the boundary of the Ben Nevis and Glen Coe National Scenic Area. Such multiple designations overlapping the proposed location require close scrutiny of the visual impact of the proposal.

Within close proximity to this proposal is a selection of well-known hilltops frequented by hillwalkers: Meall Buidhe, Meall Garbh, Beinn nan Aighenan, Beinn nan Aighenan East Top, Beinn nan Lus, and Beinn Suidhe.

Our concerns with this proposal lie with the creation of two permanent 2-metre wide hill tracks to the intake weirs on hillsides that have no existing tracks and are in a wide and reasonably open landscape. The landscape accommodates a number of walkers' paths into the hills, and the creation of walkers' paths for intake maintenance would be acceptable in areas of high landscape sensitivity, as in the Allt Hallater proposal.

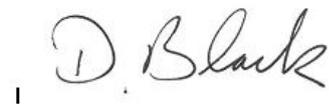
The construction access route to the western intake on the Allt nan Clach Sgoilte would require two additional cross-slope bends away from the penstock route creating further disturbance on the hillside. The successful restoration of this to allow it to blend into the landscape is reliant on the route not creating steep upslope exposures as it makes its way across the hillside. This is currently unknown.

We disagree with the assessment in Table 12.1 of the Glen Kinglass Hydros Environmental Impact Assessment Report that attributes "medium susceptibility" to people taking part in outdoor activity where scenery is important. We suggest that if scenery is important then "high susceptibility" would be a more appropriate category to use.

The Landscape and Visual Assessment chapter states that the visual impact envelope is distance of 1 kilometre from the proposed construction features. This fails to consider the views from the nearby hilltops, and the tracks to and from them. An important point that is not addressed is the frequency of the sighting of the new permanent tracks as hillwalkers (of high susceptibility we contend) move through the landscape to and from their destinations. The constant or intermittent exposure to such constructed features affects the perception of the wild qualities of the land in a way that static viewpoints fail to do.

We call on Argyll & Bute Council to apply Policies LDP 3, LDP Env 9 and LDP ENV 13, and reject this proposal as the visual impact on the designated landscape diminishes the wild character of the Wild Land Area and outweighs any social, economic or environmental benefits of community-wide importance.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a large, looped initial 'D'.

Davie Black
Access & Conservation Officer
Mountaineering Scotland