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Ms Rebecca Hindson  
Planning & Building Standards  
The Highland Council  
Council Offices  
84 High Street  
Dingwall  
IV15 9QN

7 September 2018

Dear Ms Hindson

**Land 4655M SW Of Gatehouse Braemore Loch Broom Garve**

Installation of hydro-electric scheme (up to 2.0 mw) including dam and intakes, buried pipelines, powerhouse, tailrace, formation of access track, borrow pits, and buried 33kV cable grid connection (EIA development)

**Planning Reference: 18/02458/FUL**

Thank you for the opportunity to comment on this hydropower proposal

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.

**Landscape and Visual Impact Assessment**

We have concerns that the Landscape and Visual Impact Assessment may underestimate the impact of aspects of this proposal in the eyes of hillwalkers and climbers.

The biggest issue is the lack of clarity and reasonable analysis of the potential impact around the entire loch shore of the drawdown of water. The ES merely states that water levels will be raised by 1.2m, which is the limit of natural flood range, and that drawdown will occur. What it doesn't do is give any indication of how long it is expected that water will remain at this high level, and how often and for how long drawdown that exposes the loch shore will occur. High level inundation will kill the existing marginal vegetation, and drawdown will expose raw substrate of boulders and shingle around the entire margin of the loch. One need only look at Loch Glascarnoch nearby to see the impact of this type of event.

We ask The Highland Council if another raw edge to a loch is acceptable in a location popular with visitors who come to enjoy walking in the Highland landscape?

Walkers in this landscape are highly susceptible to contemporary man-made intrusions and the sensitivity of their perceptions may be more than the L&VIA recognises. The main route up into the Fannichs is noted for assessment, but there is little recognition of how the proposal will look on descent, when walkers will be facing onto the area of the loch and intakes as they make their way back, or from other nearby hilltops in which the development may be in more prominent view. Drawdown may be a more significant feature here and in view for a significant amount of time.

### **Infrastructure**

Regarding infrastructure, we are concerned that the Environmental Statement is far too vague when it comes to the finish of the intakes and the post-construction maintenance access tracks. One need only look at the legacy of hydropower tracks throughout The Highland Council area in recent years to see the problems that unspecific planning conditions can leave. We do not wish to see another Attadale here on the edge of Fisherfield and the Fannichs.

We urge The Highland Council to impose planning conditions that ensure that the facings of the dam and intake weirs use carefully placed boulders, cobbles and turves to blend in with the landform and landscape, and not leave the traditional civil engineering finishing of bare smooth concrete. Likewise with exposed pipework and handrails.

The envelope within which works are proposed may cause more disturbance than anticipated, especially in areas that currently have little in the way of built structures. We would like to see tighter working corridors for the Allt Breabaig and Allt Leachach intakes on the open hillside and on peatland which will be challenging to restore.

Also a phased restoration of the penstocks would be sensible in areas of steep slopes, thin soils and high rainfall. Phasing the restoration as work is ongoing would reduce the probability of erosion which would be higher if penstock routes were opened up, left open, and restored at the end of work, as the Environmental Statement suggests.

The Environmental Statement is vague on the specification required for the post-construction maintenance access tracks. We are finding throughout the Highlands a proliferation of unnecessary hilltracks causing long-lasting scars across landscapes. They are often over-designed for the usage they get, and are open, exposed and unvegetated for longer than was originally anticipated.

We note that in in planning proposals more attention is often paid to powerhouse design and cladding than on the landscape impact of loosely defined maintenance tracks, which arguably have a greater and longer-lasting visual impact.

We request The Highland Council determines the realistic need and usage for any particular track or path and to state planning permission conditions for the restoration dimensions and techniques required to achieve that.

The applicant suggests a 4x4 access track through the plantation to the dam intake. It would be helpful to state the width that such usage requires, for example 2.5m – 3m width being adequate for a normal 4x4 vehicle.

We think that maintenance of the Allt Breabaig and Allt Leachach intakes does not require such a design specification as maintenance for cleaning can be easily managed on foot from larger tracks. Given the landscape sensitivity we suggest that The Highland Council asks for the access to the two smaller intakes to be by walkers' or stalkers' footpath with a width of less than 1.5m, surfaced for boots. This would minimise the visual impact of the line to the intake, while still allowing for regular maintenance.

For the newly created replacement path along the north shore, we urge the Highland Council to set a design specification to prevent wide, unvegetated surfaces being obvious from the surrounding hills, and to stipulate that turves be laid to from a green central strip.

The restoration of tracks requires the initial ground preparation to be absolutely correct, otherwise turf can die if stored incorrectly, and track lines taken that leave a steep side batter that resists revegetation. We request The Highland Council to state as a condition that a Landscape Clerk of Works be appointed at commencement of works to ensure the correct soil storage and track route, and for all restoration operations for track and penstock.

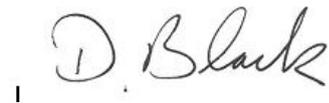
In addition, we did not see any reference to the removal of the existing track on the north shore that would be inundated. We may have missed this point. It is important that the old track is removed as when drawdown exposes the bare loch shore the redundant track will be seen running parallel to the new track above it. We ask The Highland Council to ensure that this feature is removed as it would be an obvious feature from the hills above the loch.

Our concerns are rooted in the low-level attrition of the edges of Wild Land Areas, National Scenic Areas and other landscapes identified for their wilder qualities. Assessments invariably indicate that the residual impact is minor to negligible, but this has the effect of pushing the wilder qualities further back from the identified boundary. We wish to maintain the natural capital of these places for future generations, not diminish them piecemeal.

On a final note we are disappointed that the applicant did not reach out sufficiently to the local community and to communities of interest such as ourselves and the Scottish Canoe Association in order to deal with any problematic areas arising from this proposal. It is not helpful that the submitted application does not mention Loch a Bhraoin in the title, as that is how people recognise the location.

If you have any doubts at all on the probability of an appropriate outcome in the landscape being achieved, then we would welcome and support a refusal of this hydropower proposal.

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**