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FAO: Susan MacMillan

27 July 2018

Dear Sir/Madam

**Planning Applications for construction of run-of-river hydropower schemes at Allt Charnan, Allt nan Gaoirean and Allt a'Bhiorain, Glen Etive
Planning References: 18/02738/FUL, 18/02724/FUL, 18/02726/FUL**

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.

Mountaineering Scotland has concerns about the stated need for new permanent maintenance access tracks for these three run-of-river hydro power proposals, given the existing extensive forest track network in the vicinity of the proposed developments that can provide access for occasional maintenance visits.

In addition, the proposals for managing public access are scant and lack the detail necessary to provide assurance that appropriate access to the hills will be maintained during the construction phase and through reinstatement of tracks and paths after construction.

We therefore request that The Highland Council considers these points for these three proposals and request the applicant to produce revised plans that alleviate the potential additional visual impact caused by new permanent maintenance tracks.

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 look closely at all developments that may affect the landscape qualities that our members and the wider public enjoy, around hilltops that are used by walkers, climbers and skiers, and especially those that may have an impact in National Parks, National Scenic Areas and Wild Land Areas.

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, like Glen Etive.

These three proposals lie within a National Scenic Area and are surrounded by a Wild Land Area, with Glen Etive being a very popular destination for hillwalking with a number of Munros, Corbetts and adjoining ridges on either side of the glen, readily accessible from the glen floor.

We are aware that the land around these proposed hydro power developments has been modified by plantation forestry, with associated surfaced forest tracks. These existing tracks provide access up the hill. The applicant recognises this and proposes using the existing network, with short spurs off these to reach the proposed intake and powerhouse locations.

We do question the need to create new permanent tracks to 1.8m width, adjacent to the penstock after construction is completed, where the existing forestry tracks can be used to allow maintenance access. This seems to us an unnecessary number of additional tracks where the existing forest track network would serve for occasional maintenance visits.

These proposed permanent tracks, even though scaled back to 1.8m as suggested, create additional visual impacts in the landscape over and above the existing road network. In a softwood plantation situation, the penstock would remain in a wide tree-free corridor to prevent root damage to the pipe, and any additional tracks would be visually obvious from a distance. The route of the penstock would be flat and become grassed-over, looking almost indistinguishable from a forest fire-break. A permanent track not shielded by trees would be an obvious linear built feature in the surrounding landscape of high visual sensitivity.

We request that The Highland Council consider this for all three proposed schemes, and request from the applicant a revised plan that eliminates the need for a new, long, permanent maintenance access track along the route of the penstock.

Public Access

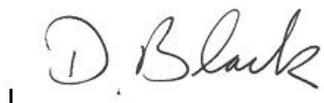
The hills around Glen Etive are rightly known for their scenic and wild qualities and are very popular with walkers and climbers. There are a number of recognised paths taken from the glen floor to the tops in addition to more informal routes connecting tops and ridges to allow ascent and descent.

The applicant notes this but provides little detail on the impact of construction activity on existing pathways. It is easy enough to say that diversions will be put in place to maintain access, but the quality of diversion is important for walkers – a marker directing walkers away from construction routes and across rough and boggy terrain for example would be unacceptable for both physical safety and surface erosion.

We would have expected an Access Management Plan to have been submitted for each proposed development, giving details for diversions during construction and provision of car parking places and reinstatement details of path and track conditions, and any fence crossing points.

Also, the cumulative impact on visitors and the effect on tourism has been underplayed within the proposal, while making mention of short-term construction jobs. One of Scotland's scenic glens becoming a construction site will have adverse impacts and we would expect the applicant to have looked at this in more substantial detail. A statement that "construction of the Development would have minor to negligible effects upon the enjoyment of visitors to the local area" needs much closer scrutiny.

Yours sincerely

A handwritten signature in black ink that reads "D. Black". The letter "D" is large and stylized, with a vertical line extending downwards from its base. The word "Black" is written in a cursive, flowing script.

Davie Black
Access & Conservation Officer
Mountaineering Scotland