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FAO: Susan MacMillan

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Dear Sir/Madam

Planning Applications for construction of run-of-river hydropower schemes at Allt Ceitlein, Allt Mheuran and Allt Chaorin, Glen Etive
Planning References: 18/02739/FUL, 18/02741/FUL, 18/02742/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 **objects** to these three run-of-river hydro power proposals on the grounds that the applicant has failed to take properly into account the impact of the proposed power houses, penstocks and access tracks on the wild land qualities as perceived by walkers and mountaineers accessing the hills on either side of Glen Etive, lying within Wild Land Area 9 - Loch Etive Mountains.

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.

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.

Landscape and Visual Impact

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

These three proposals come under close consideration as they lie within a National Scenic Area

and 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 accept that the special qualities of the Ben Nevis and Glen Coe NSA are large scale and that the development proposals are small in scale and involving localised changes in landform. However, the cumulative impact of access tracks in the NSA is a consideration that The Highland Council has to take into account, not just for these proposed developments, but in total across the NSA though forestry and other agricultural or sporting land uses.

Of greater concern is the impact of these proposals on the wild qualities of the Loch Etive Mountains Wild land Area. It is not so much the intakes or even the power housing, which will be landscaped to blend in as a turfed mound in the landscape, as the construction access tracks and quality of reinstatement in sensitive and fragile mountainous environment.

Paragraph 200 of Scottish Planning Policy states: "Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development."

Paragraph 215 expands on this statement: "In areas of wild land (see paragraph 200), development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation."

It is our opinion that the applicant has provided insufficient information in construction and design statements to allay concerns about the residual visual impact of the access tracks and penstock routes. The locations of these proposals are in open and sensitive landscapes, obvious from the west side of the glen and from routes up to the eastern High Tops.

These linear features will have a different and contrasting colour and texture from surrounding areas when viewed both up close and from afar, drawing attention to them, thereby increasing their visual impact on hillwalkers, where the value of the natural flow of line and colour in the landscape can be high. The environmental statement recognises that hillwalkers have a high visual sensitivity. These linear features will be conspicuous or prominent in the landscape until some unspecified time in the future.

The guidance produced by SNH for these features "Constructing Tracks in the Scottish Uplands" (updated 2015) is the standard that developers need to follow and be seen to follow. Restoration very much depends on initial ground preparation and the detail of that and restoration technique is conspicuously absent in these proposal, especially given that they are proposed within an area identified for its nationally significant landscape and wild qualities.

Natural revegetation is a sound ecological principle, where the recolonising vegetation is genetically suited to the environmental conditions. This works well in areas where plants grow quickly and mask the rawness of constructed features. In upland environments the dynamics of plant growth are different from low-lying land and no evidence has been provided as to the speed of revegetation on bare ground, nor the species mix of the vegetation covering the worked land. A green grass strip in a brown heather hillside will still persist as a visual liner feature even if the bare substrate is more or less covered. The applicant provides bland statements on restoration timescales without any evidence base to allow meaningful assessment on the longevity of tracks scarring the hillside.

We recognise the intention of the applicant to restore the construction tracks down to 1.8m width, but we question the need for a design specification such as this for basic routine maintenance visits and suggest a lower path spec would be more appropriate to preserve the wild qualities within the Loch Etive Mountains WLA. An upland hill-path would be the expected feature in this landscape.

The generating capacity of these proposed hydro schemes is low, and it is our opinion that the residual visual effect of tracks and penstocks is disproportionate to the power generating potential; a public disbenefit is generated and a reduction in the natural capital of the wild qualities of the landscape.

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



Davie Black
Access & Conservation Officer
Mountaineering Scotland