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Ms Lucy Prins
Planning & Building Standards
The Highland Council
Charles Kennedy Building
Achintore Road
Fort William
PH33 6RQ

7th November 2018

Dear Ms Prins

Proposal to construct and operate a run-of-river hydro scheme (Scheme 5 - Allt Leachdach and Allt Beinn Chlianaig), Leanachan Forest, Torlundy, Fort William

Planning Reference: **18/04648/FUL**

Mountaineering Scotland has assessed the proposal, for its operational phase, in terms of its likely effect upon mountain assets and mountaineering activities. This proposal pushes development ever higher and into a Wild Land Area, above existing development structures.

Mountaineering Scotland objects to the intake weir and penstock on the Allt Beinn Chlianaig, on grounds that it is a major civil engineering project in a sensitive upland location, altering the landscape character of this part of the Wild Land Area and significantly reducing the wild qualities of this hillside.

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.

Visual Impact of construction access tracks, intake weir and penstock route.

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. This assessment should be read in the context of this being an analysis from a mountaineering perspective.

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 Allt Leachdach and Allt Beinn Chlianaig proposal is an incursion into the Wild Land Area.

It lies within an area identified in the Highland-wide Development Plan as being of National Importance. Policy 57 of the HWDP states that The Highland Council “will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance”.

The electricity generated by this particular installation is not of national importance as other renewable power generation sources are available. The generation of renewable power is not necessarily site-specific, whereas the adverse impacts of any particular development are.

The importance of wild areas is demonstrated by Scottish Planning Policy (2014), Paragraph 200, that notes that wild land qualities are “very sensitive to any form of intrusive human activity and have little or no capacity to accept new development.” Paragraph 215 goes on to state that “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.”

The Allt Leachdach intake weir and penstock is low-lying in the glen, predominantly within an area that has had development activities over time. However it does have an impact, taking engineering just beyond the existing point of development. This can be mitigated by careful screening of the weir facings with local boulders and turves, and reducing the visual impact of other infrastructure to blend in with the surrounding landscape. The track up to the Lairig Leacach is an existing feature and careful reinstatement can reduce its visual impact. No permanent tracks to the intake weir can reduce the visual impact. However, unintended ATV usage could create erosion. Restriction on the use of atvs for maintenance visits would be a welcome stipulation in planning conditions. We request that the Council consider the implications of failure to achieve the restoration aims and the means available to the Council to ensure that the wild qualities of the landscape are maintained.

The Allt Beinn Chlianaig intake weir and penstock lies beyond the existing hydropower infrastructure in an area that is untouched by development. The penstock route, even though reinstated will create an obvious line across the hillside substantially above the existing 4x4 tracks and older hydropower infrastructure. The assumption in the Environmental Report is that penstock restoration will leave no trace and that maintenance access will be on foot. It is not clear in the Report how prohibiting the use of ATVs for intake maintenance can be policed and there is a significant chance that given the distance from the main track ATVs may be used and if so an erosion line will develop. This in our opinion cannot be mitigated against.

It would be a significant visual intrusion to hillwalkers heading to the Graham, Cnap Cruinn (a Graham is a Scottish hill between 2000 and 2499 feet high with a drop of at least 150 metres on all sides). A popular route starts from Insh then takes the track to the old hydro power intake. The river is followed and a line picked to reach Beinn Chlianaig before heading along the ridge to Cnap Cruinn. Infrastructure is passed at the old dam, with wild land stretching ahead. This proposal would push the expectation of that wild land further away, diminishing the experience.

We urge The Highland Council to protect the wild land qualities of this area for future generations to experience and enjoy and to refuse permission for the intake weir and penstock on the Allt Beinn Chlianaig.

Yours sincerely

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

Stuart Younie
CEO, Mountaineering Scotland