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FAO: Susan MacMillan

20 December 2018

Dear Sir/Madam

**Installation of a run of river hydro-electric scheme (885KW), including one intake structure, buried pipeline, powerhouse building, outfall, bridges, formation of borrow pits and access tracks (Allt Mheuran) (revised application - previous 18/02741/FUL), Land 650M SW Of Coiletter Glenetive
Planning Reference: 18/05440/FUL**

Mountaineering Scotland **objects** to this revised run-of-river hydro power proposal. The revised proposal on its own takes account of landscape sensitivities, but the cumulative impact with the other hydropower proposals in the glen, lying within Wild Land Area 9 - Loch Etive Mountains, will create a negative impact on the wild land qualities as perceived by walkers and mountaineers accessing the hills on either side of Glen Etive. We maintain our objections to the Allt Ceitlein (18/02739/FUL) and Allt Chaorin (18/02742/FUL) as well as this revised proposal and suggest that all the schemes in Glen Etive plus their grid connection need to be assessed collectively and not individually, in order to protect the integrity of the National Scenic Area and the qualities of the Wild Land Area.

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.

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.

This revised proposal is a recognition of the negative impacts that construction of a hydropower scheme can create in sensitive landscapes. 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.

Major civil engineering projects, and run-of-river hydropower schemes are such, can have a deep and lasting impact on the landscape. Some may be sensitively done, and others provide a reminder of what can go wrong with a scheme that looks reasonable on paper. The Highland Council will need little reminding of the impact of construction work in upland locations that are fragile and slow to recover.

Landscape and Visual Impact

These three proposals, Allt Mheuran along with Allt Ceitlein and Allt Chaorin, 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.

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."

The cumulative impact of construction infrastructure and legacy tracks in the NSA and Wild Land Area is a consideration for The Highland Council to take into account, not just for these proposed developments, but in total across the NSA through forestry and other agricultural or sporting land uses.

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 linear feature even if the bare substrate is more or less covered.

The Highland Council has experience of around 300 such small-scale hydropower schemes over the past 10 years. The post-construction monitoring of these proposals should be able to inform the Council of the effectiveness of landscape restoration plans.

With 90% of these run-of-river schemes having already been given planning permission, the Council can afford to scrutinise the impact of proposals in areas of great landscape sensitivity and the value of that for the public benefit, and reject proposals that would mar the qualities for which the area is identified.

The generating capacity of these proposed hydro schemes is low, and it is our opinion that the residual visual effect of construction 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.

We urge The Highland Council to look closely at the cumulative impact of a major construction project within a nationally important glen, and to refuse proposals that would detract from its value.

Yours sincerely



Davie Black
Access & Conservation Officer
Mountaineering Scotland