

By email: helen.batey@sse.com

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Dear Ms Batey

Dunoon to Loch Long 132 kV OHL Rebuild Consultation

Thank you for the opportunity to comment on your proposed route options for the Dunoon to Loch Long 132 kV OHL Rebuild project.

Mountaineering Scotland is a membership organisation with almost 15,000 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.

Our interests lie with the perceptions of landscape and its scenic and wild qualities, and the wildlife that lives there. Walkers and climbers move through the landscape to mountain destinations, they are not stationary observers of landscape. It is therefore the overall effect of the proposed project as it is viewed in the landscape that is important, and not only from static viewpoints.

Our main focus is on the potential effects of construction on the landscape qualities, and visual impact in the area that the route traverses. This includes the line itself and any permanent stone roads, with the effects of construction and quality of restoration of temporary access roads being a key consideration in this.

You ask for consideration of four specific questions.

1. Have we explained the need for this Project adequately?
2. Have we explained the approach taken to select the Preferred Route adequately?
3. Are there any factors, or environmental features, that you consider may have been overlooked during the Preferred Route selection process?
4. Do you feel, on balance, that the Preferred Route selected is the most appropriate for further consideration at the alignment selection stage?

The first two are related to the process of route selection, and we think that you have adequately explained your reasoning behind this assessment.

Question 3 is important to our interests, and we note that you have considered recreational routes. We also note that hillwalking and climbing objectives such as the summits of hills have not been

explicitly referenced. Beinn Ruadh is a Graham (Grahams are the mountains in Scotland between 609.6m and 762.0m high, with a drop of at least 150 metres on all sides) and as such will be a recreational destination for hillwalkers. Access to this summit can be taken from the north at Larach Hill, and the south from Inverchapel and also from Puck's Glen. This may be a factor to consider at subsequent stages.

Regarding Question 4, your assessment of the constraints at this level seems reasonable.

We wish to draw your attention to some points that will require further consideration in the next stage of the planning process; a level of detail that is essential, and implied in the strategic points of principle stated in this consultation document.

Firstly, you state that "it is not anticipated at this stage that new permanent vehicular access tracks would be required..." and that "all temporary construction access tracks would be removed upon completion of the Proposed Development with land being reinstated to its former condition. Any retention of new accesses will be included within the consent application for the replacement OHL."

We would expect any new tracks to be an absolute need and given detailed justification, and not be just a desire for convenience. In addition, and it may be stating the obvious, but we think it worth acknowledging that natural regeneration in a cold, wet and exposed landscape such as the Cowal hills will be of a different character and pace than what would be expected in areas with deeper, richer and more sheltered soil profiles.

Recent hydro scheme projects in the National Park can give realistic evidence of how well natural regeneration of vegetation will or will not proceed. We suggest that an acceptable standard of restoration be specified in future method statements, defined, for example, as an agreed percentage of cover of vegetation over a defined number of years.

Temporary access tracks are just that: temporary. We would expect the planning authorities involved in the setting and in the enforcement of planning conditions to insist on the removal of temporary tracks and reinstatement of the landform to its pre-construction state. Examples can be drawn from the Beaully-Denny Transmission Line, especially around the Drumochter-Dalnaspidal-Dalwhinnie area where what were identified as temporary construction access tracks have remained in place for a good number of years after completion.

Mountaineering Scotland's goal is to prevent further loss of the wild qualities of the land, on and adjacent to the route of the proposed replacement powerline, with a target of no net loss of the wild qualities of the landscape along the length of the route. The test of this lies further down the Environmental Impact Assessment process where care and attention are given to initial groundworks; in layout and alignment of tracks, and in the stripping and storing of turves; in the reinstatement profiles and turf replacement.

We hope these comments are helpful to you in your further consideration of this project.

Yours sincerely



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