

By email: Lisa.marchi@sse.com

Ms Lisa Marchi
Scottish Hydro Electric Transmission PLC
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24 April 2020

Dear Ms Marchi

Skye Reinforcement Route Options Consultation

Thank you for the opportunity to comment on your proposed route options for the Skye transmission line reinforcement project.

Mountaineering Scotland is a membership organisation with over 14,000 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 wild qualities. Walkers and climbers move through the landscape to mountain destinations, they are not static observers of landscape. It is therefore the overall effect of the proposed project as it is viewed in the landscape that is important.

Our main focus is on the potential effects of construction on the landscape qualities and visual impact in the National Scenic Areas and Wild Land Areas 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 5 specific questions.

1. Have we adequately explained the changes in respect of the need for this Project?
2. Have we adequately explained the reasons why the capacity of the line has to increase which will result in changes to the existing infrastructure along its route?
3. Have we adequately explained the methodology used to re-appraise the preferred route for the new OHL design?
4. Are there any factors, or environmental features, that you consider may have been overlooked during the route appraisal process?

5. Do you have any other comments in relation to the drivers for the project, related to the transmission infrastructure requirements, or preferred route?

The first three are related to the process of appraisal of route selection, and we think that you have adequately explained your reasoning behind selecting your preferred route options.

Question 4 is important to our interests, and we note that you have considered National Scenic Areas, Wild Land Areas, recreational routes and hillwalking and climbing objectives such as the summits of Munros and Corbetts. No significant omissions are apparent to us.

Regarding Question 5, 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 wildness along the length of the route, and indeed would welcome any increase in wild qualities of landscape that could be achieved as 'planning gain'.

You will be aware of Scottish Planning Policy statements on wild land. Paragraph 200 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. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas."

Paragraph 215 states: "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."

National Planning Framework 3 states that "National Scenic Areas and National Parks attract many visitors and reinforce our international image. We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset."

From our perspective, the critical areas of National Scenic Area and Wild Land Areas that may be affected lie within Sections 2 and 4 and in the wilder qualities of Section 5.

Your consultation document recognises the challenges that constructing a powerline in wild land poses. The visual impact of new tall steel towers in landscapes with little in the way of built infrastructure is a serious concern to us, and especially where mitigation may be limited. One mitigating factor in your selection of route options through the wilder landscapes is the presence of an existing powerline that the proposed route generally follows.

Our concerns lie with the effect of new steel lattice towers, the creation of stone access tracks, the removal of redundant infrastructure, and the reinstatement of landforms. The consultation document helpfully states the general principles of construction management in section 2.4 Access During Construction. We welcome the intention to use lower impact access solutions, using existing tracks where possible and tracking panels and bog mats on sensitive ground.

We wish to draw your attention to a number of 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, your principles state that "permanent access tracks would only be required in more remote areas where access during construction requires a higher specification track, and where long-term maintenance needs require permanent access." We would expect this to be an absolute need and given detailed justification, and not be just a desire for convenience. We expect no additional permanent tracks in Wild Land Areas and Special Areas of Conservation.

Secondly, it is stated that "all temporary tracks would be restored as closely as possible to their pre-existing condition using natural regeneration techniques on completion of the works." 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 Glen Shiel region 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 can give realistic evidence of how well natural regeneration of vegetation will 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.

Thirdly, temporary stone access tracks are just that: temporary. 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 number of years after completion. We would expect the relevant 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.

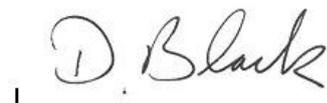
Additionally, this matter may be complicated by estates through which the tracks run appealing for retention of the tracks for estate management purposes, which has also happened in the Beaully-Denny Transmission project. Any such appeals in the wilder landscapes would be likely to receive strong opposition.

In conclusion we note the recognition of the potential difficulties in creating the reinforcement of the powerline through sections of this landscape, and the intention to work sensitively in these areas. 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 urge SSEN to consider how these proposed works of construction and dismantling could help with maintaining no net loss of wild qualities in the National Scenic Areas and Wild Land Areas, and actively support an increase in wild qualities of landscape where opportunities can be identified for this.

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

Yours sincerely



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