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9 May 2018

Dear Sir/Madam

### **Revised Coire Glas Pumped Storage Scheme (ECU Reference ECU00000577)**

Thank you for the opportunity to comment on the revised Coire Glas pumped storage hydro scheme.

Mountaineering Scotland 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 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 recognises the need for such schemes and did not object to the original proposal for 600MW which was granted planning consent in 2013. We do not object in principle to this revision of the scheme, increasing capacity to 1500MW, but there are elements within the revised scheme which cause us concern, specifically relating to landscape and recreational access.

#### **1. Visibility of any above-ground elements of the surge structure and ventilation structure**

The increased capacity for generation requires greater water flows and that needs surge and ventilation shaft structures that were previously not required to this extent. The detail contained within the Design Statement provides the mitigation to avoid intrusive structures high on the hill. Design will be important and the siting and use of materials would avoid any sky-lining and unsympathetic finish to structures. We would expect planning conditions to confirm this.

#### **2 The visual impact of permanent gravel roads**

Of more concern to us than the structures are the additional permanent gravel roads required for access to the top of the surge structure (at c.650m altitude) and for access to the intake tower from the south shore of the reservoir. The former is over 2km in length. The latter is on an extremely steep cross-slope.

Reinstatement of these permanent tracks to a lower spec for maintenance than that required for construction would minimise the visual impact of them post-construction. A suitable spec for the lesser-used tracks could be no more than pick-up truck width and that they have a greened centre line. There is guidance from Scottish Natural Heritage on this and the Loch Lomond & Trossachs National Park has example conditions for its hydro scheme approvals.

The road to the intake tower has the potential to create an uphill exposed and eroding slope. The objective of setting planning conditions is to minimise the visual impact of what was originally

consented as a single road leading to the dam, with a short spur to the base, and is now proposed to be much more extensive and more visually intrusive from Sron a' Choire Ghairbh and its ridges (Meall a'Choire Ghlais and Sean Mheall-Meall Dearcag) and from Ben Tee. The angle of the road against the slope needs careful alignment and the mitigation measures proposed in the Design Statement would make suitable planning conditions if the route of the track is such that scarring of the hillside is minimised.

An important consideration in track restoration work is the initial preparatory work, where turves and soil types are removed separately and stored sustainably for use in restoration. It is often at this initial phase of work that subsequent restoration measures can succeed. This is a skilled task and a Landscaping Clerk of Works, onsite at the outset of any preparatory work, to guide the removal and storage of soil and their post-construction use would be a welcome condition imposed upon the applicant.

### **3 The reinstatement of the temporary haul road**

The intention behind the temporary haul road from the loch-side is laudable – to use as much of the dug-out rock as possible in the construction of the dam, assuming that such spoil is usable and is consented for use.

However, there can be no doubt that it will be a substantial scar on the hillside since heavy engineering will be needed to construct a road suitable for heavy haul trucks on a significant cross-gradient. The Non-Technical Summary offers the simple statement that “This would be reinstated and re-profiled post construction.” and the Design Statement offers technical solutions.

This statement belies the difficulty in creating a road on that gradient that can be removed and returned to something like its original condition in any meaningful timescale. If it is temporary, albeit probably for several years, it might be regarded as acceptable.

We would expect the consenting authority to stipulate more detail on slope track construction and restoration. A Landscaping Clerk of Works to oversee ground preparations, soil storage and restoration would assist with minimising the long-term impact of this temporary haulage track.

A further point regarding the temporary haul road is our experience of seeing such roads created with the intention to reinstate the original surface, but subsequently subject to further applications by landowners to retain the road. These local retrospective planning applications are often successful and negate the protection given in the original consent that the construction roads would be temporary. If this happened in this case there would be a significant intrusive scar on the landscape and seen from a number of viewpoints.

We seek the reassurance of the consenting authority that the temporary track across the hillside is just that, and that a legal or regulatory device be put in place to ensure that it is removed after it has served its purpose. Removing a road can be an expensive business and we suggest that a financial bond be stipulated to cover the estimated cost of removal and landscaping and be held for restoration works after construction.

### **4. Recreational access during and post construction**

We note that the recreation section deals with the potential impacts to recreational users of the proposed site. We agree with the applicant that to mitigate potential significant impacts through the use of alternative walking routes, discussion with stakeholders needs to take place. We would also add that access through all of the proposed site needs to be managed to facilitate passage, not just for existing infrastructure and Core Paths, but for informal access to the tops and ridges too. This will require, through operational guidance, that site staff be briefed on access rights and responsibilities, and how to manage recreational access outside of the formal path network.

We suggest that planning conditions insist that an Outdoor Access Management Plan addresses the significant potential disruption to climbing the two munros, Sròn a' Choire Ghairbh and Meall na

Teanga, and Ben Tee. This would bring clarity to wording in Section 19.3.1 of the Non-Technical Summary of "...provision of alternative walking routes, parking and access provisions within the vicinity of construction activity..." and the even more ambiguous statement in Section 3.2.5 Access Tracks that "...in accordance with the requirements of the Land Reform (Scotland) Act 2003 where this does not conflict with the health and safety requirements of the construction site.

It is our understanding that the legal right of recreational access and the requirements for the health and safety of all persons in the construction site must co-exist. It is not a question of "conflict" but of management and proportionate responses, both spatially and temporally, that cover legal requirements.

Mountaineering Scotland would be happy to assist with advertising to the hillwalking and climbing community any diversions or similar that are put in place.

We look favourably on the statement in section 3.2.5 that alternative recreational access routes in the forestry sections be created to the standard of the Great Glen Way and could remain in place as a permanent realignment to this section of the Great Glen Way.

We would expect that planning consents confirm this and state that any such undertaking be of comparable quality, or greater, regarding the experience of the views and the landscapes, and not just the quality of walking surface. This would alleviate concerns that temporary paths are created and left in place through expedience and cost-savings.

In conclusion, we do not object in principle to this scheme but we are concerned about the visual impact of new elements in the revised plan, and we consider any restoration must be to the highest standard. In addition, we view the provision of a substantial financial bond essential to ensure work is completed to that standard.

Yours sincerely

A handwritten signature in black ink, appearing to read "Stuart Younie". The signature is written in a cursive, slightly slanted style.

**Stuart Younie**  
**CEO, Mountaineering Scotland**