

To The Highland Council, Planning Department

**Mountaineering Scotland Objection to A'Chailleach hydropower scheme, Achnacarry
18/03860/FUL**

Submission to online Planning Portal

20 September 2018

Mountaineering Scotland objects to this run-of-river hydropower proposal because of the visual impact of constructed tracks partially within Wild Land Area 18 – Kinlochhourn-Knoydart-Morar and as experienced by hillwalkers accessing nearby hilltops.

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.

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. 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 of national importance and where they are close to popular hillwalking and climbing areas.

The proposed post-construction maintenance tracks are likely to cause a significant visual intrusion into a remote and wild mountain landscape. SNH acknowledge this in the Environmental Statement: "The infrastructure of main concern were access tracks with regard to visual impact"

The ES also indicates that "Significant effects are also anticipated for the WLA's special qualities of sense of naturalness and sense of sanctuary. These would be moderate, reducing to low with moderate localised effects in the longer term". The final assessment is a subjective value judgement – sensitivity of this effect will be high for recreational users seeking the remoter areas.

In areas noted for wild landscape qualities development should necessarily be of the most sensitive construction with a view to reducing visual impacts. This proposed development would be far too intrusive for the area. The maintenance tracks are overdesigned for their actual purpose. This is a common feature of many small-scale hydropower schemes. It would be sufficient to have tracks of a spec for quad bikes from the public road to the two main intake chambers 1.5m wide, with 1.8m wide on bends. From there it would be sufficient to have a well-constructed footpath to each small intake, of 1m width, for the purposes of cleaning them. This technology is often stated as being robust and requiring little maintenance, it will not require a 4x4 specification for this.

The reference in the ES to the tracks having a positive effect by providing access tracks which can be used by walkers can be dismissed as irrelevant. A recent survey of our membership indicated that

constructed tracks in wild landscapes are a topic of major concern to them. A well-constructed footpath would be sufficient.

In conclusion, this development is too large and intrusive, impacting on landscape sensitivities. A smaller proposal may be more acceptable where small intakes serviced by footpaths would fit with the landscape.