

## Why both sides of Glen Etive matter

### Description



Beinn Fhionnlaidh and Meall a Bhuiridh, Allt Mheuran, Glen Etive, Highland, Scotland Photo copyright Colin Prior

Following my piece, illustrated with David Lintern's fine photos, on the would be desecration of Glen Etive by 7 hydro schemes ([see here](#)) Tim Parkin, who runs a landscape photography magazine (<http://www.timparkin.net>), offered to get more photos for use on Parkswatch to help show what is at stake. One of the things I should have said in my last post about the value of the landscape in Glen Etive is its importance to photographers, including photography tourism.

I am incredibly grateful to Tim and to Colin Prior (<https://colinprior.co.uk/>) for providing Parkswatch with the photo above which is taken west across Glen Etive from the Allt Mheuran. It illustrates, far better than my words, why both sides of Glen Etive matter and why the entire glen falls within the National Scenic Area. It may be mainly conifer plantations on the west side of the glen in the enclave that is not a designated wild land area, but imagine Colin's photo without that backdrop. I think it shows we need to deal with the glen as a whole (two of the seven hydro schemes will be located in the backdrop to this photo, the Allt Charnan and the Allt nan Gaoirean).



Photo credit and copyright Tim Parkin

One of Tim's own photos, also taken from the Allt Mheuran, but looking south west also illustrates this point. The blanket block of forestry on the shoulder of Beinn Trilleachaeon does mar to a degree what is a fine view but does that justify making it worse? The Allt Bhiorain pipeline is to be constructed through the area of felled forestry and then up through the trees above. It will compound the damage that has been done by poor forest planning and management when what we should be doing with our finest glens is restoring them to their full landscape potential (and that incidentally I believe would create more jobs long term than hydro).

In my first post on Glen Etive I commended the response from John Mackay who objected to all seven hydro schemes on the basis that they should be seen as a whole (as he says these schemes should be treated as one major rather than 7 separate developments). I have now obtained a copy of John's response, which was public but too large to download, and pasted below. I recommend that anyone who cares about what is being proposed in Glen Etive reads it.

I am now in the Alps for a couple of weeks but hope to do further posts using Tim's and other photographers photos when I return (they are of course not responsible for any of the opinions I have expressed here).

## **Response from John Mackay to the seven Etive Hydro Schemes and on the importance of the National Scenic Area**

The Highland Council – Planning: eplanning centre

Glenurquhart Road

INVERNESS IV3 5NX

4 August 2018

Dear Sir/Madam,

### **GLEN ETIVE RUN-OF-THE-RIVER HYDRO-SCHEMES**

**18/02738/FUL Allt Charnan; 18/02739/FUL Allt Ceitlein; 18/02740 FUL Allt Fhaolain;  
18/02741/FUL Allt Mheuran; 18/02742/FUL Allt Chaorainn; Allt nan Gaoirean 18/03024/FUL and  
18/03026/FUL Allt a Bhiorain;**

1. I wish to object to the current applications to construct seven small hydro-electric schemes in Glen Etive, as listed above. My concern is the adverse cumulative impacts of these proposals on Glen Etive's scenic qualities and their enjoyment by the public.

### **The National Significance of Glen Etive**

2. **National landscape significance** Glen Etive is an integral part of the wider Glen Coe and Rannoch Moor landscape and thereby part of the more extensive *Ben Nevis and Glen Coe National Scenic Area*. Glen Etive lies between the Glen Coe and Black Mount massifs which, taken together, have long been recognised as mountain landscapes of outstanding scenic importance and high recreational value. This significance is of national importance, given the NSA designation, but setting formal designations aside, these hills are generally regarded by the outdoor recreation community as outstanding mountainous landscapes in a UK context.

3. The early acquisition in 1935 of the Glen Coe property by the National Trust for Scotland was a marker of the area's significance for mountaineering in Scotland. But the main start in Britain to the official recognition of the nation's scenic resources (both north and south of the Border) dates back to the 1940's, late on during the Second World War, when there was active forward planning for significant societal change post-war. This survey of scenic resources was linked to growing participation in open-air recreation in the interwar period and the need to care for our best landscapes, both as a national asset, and for their enjoyment by the public as part of social change.
4. There has been a consistent formal recognition of the landscape quality of Glen Etive and its adjacent hills through:
  - identification in the end-of war Scottish surveys (the Ramsay Reports<sup>[1]</sup>) of the Glen Nevis-Glen Coe-Black Mount area as one of five prospective National Parks for Scotland;
  - with the prospect of national parks for Scotland being set aside post-war<sup>[2]</sup>, these five areas were held 'in reserve' as five National Park Direction Areas; and
  - these NDPA areas were mostly<sup>[3]</sup> succeeded by *National Scenic Area* status in the early 1980s.

While the mapped boundaries of the protected area options mentioned above do differ in their extent, they all retain at their core the Nevis to Black Mount hills including Glen Etive, and bids for National Park status for Glens Coe, Nevis and their surrounds still continue. National Scenic Areas were described by the responsible public agency of the day – the Countryside Commission for Scotland – as '*...40 areas, which we consider to be... of unsurpassed attractiveness which must be conserved as part of our natural heritage*'.

5. Over the post-war decades, the public arrangements for the safeguard of Scotland's finest landscapes have not been sufficiently robust. In a review published in 1962 by the National Trust for Scotland of the need for better care of our mountainous landscapes, the author (the well-known mountaineer Bill Murray) offered the blunt and oft-quoted statement that "*...The outstanding beauty of the Highland scene, which is one of the nation's great natural assets, has been haphazardly expended and no account kept*". However, in recent years the statutory basis for the NSA and the obligations on the public sector thereto has been rationalised. For a nation with lauded scenic qualities, the 12.7% extent of the NSA suite across Scotland may be declared modest.
6. Today's protection of the more remote and natural of these top-tier landscape areas (and some other areas of their kind) is supplemented by having Wild Land status. The need for special recognition of wild land emerged from longstanding debate about what is special about our best upland landscapes, this linked to recognition of the degree of past attrition to such places from

post-war hydro-power and afforestation. While the more recent emergence of this wild land policy was an initiative by SNH, commitment to the concept has grown and improved maps of the prime wild areas were recently issued by SNH. Wild land is not a formal statutory designation but it is recognised and supported in national planning policy in National Planning Framework 3 at para 4.4[4].

7. **High recreational value** Again there is general recognition of the high recreational value of the whole area. Glen Etive itself has such value across a spectrum of outdoor activities, including some with a high technical content: thus the Etive Slabs provide a distinctive and valued setting for rock climbers; and the high quality of the opportunities for canoeing on the River Etive and some of its tributaries are well described in other submissions. But a majority of visits for the active pursuits will be for all-season walking/climbing on the hills, the winter visits often being a serious and testing mountaineering experience; and many others also come to walk on low ground or just to enjoy the mountain landscapes through car-based touring.
8. The underpinning to most use of our hills for the active pursuits is based more on the aesthetics, the experiential connections between participant and place. The quality and character of the fine mountain groups of Glen Coe and Blackmount, including the outstanding Ben Starav, provide the main recreation attraction. Etive is a main entry point to these hills and this glen is much more visited than in the past, as tourism has grown and with more people climbing the hills. Here, the quality of the scenic environment will be an inspiration to all, and this is the starting point for the range of social and psychological benefits people gain from open-air recreation, such as the pleasure and inspiration of escape from life-styles in developed settings; and the aesthetics of contact with a more natural world. In this way, most open-air recreation is environment-led, through committed participants having a strong engagement with the beauty and tranquillity of the countryside and, in the rugged settings of Glen Etive, there is much solitude, wildness and challenge to be found.
9. There is no formal mechanism for the identification of recreational value, but legislation for the protection of landscape is underpinned by a statutory relationship between public enjoyment and the care of landscape. This link dates back to the 1949 National Parks legislation[5] which led to the national parks system south of the Border. This link between enjoyment and landscape protection was built into subsequent legislation for Scotland and it remains today in the core legislation that underpins the work of Scottish Natural Heritage.
10. I do not agree with the LVIA conclusions for this development that there will be no significant effects on the recreational interest. The reality is that places like Glen Etive provide outstanding opportunities for the enjoyment of open-air recreation that have national importance, and I return to this point below. While not part of the present case it is the reality that, with growth in use of the glen, there has emerged a need for more management for open-air recreation at the busy

periods, and this is part of the case for continued bids for national park status. If government were to move in this direction, there is no doubt that the Ben Nevis to Black Mount area would be the prime candidate for such designation.

### The role of hydro-generation

11. **Recent development** The past decade has seen a significant expansion of small-scale hydro development across upland Scotland, as portrayed on Highland Council's own map of the distribution of this activity, and much of this has been fostered by the Feed-in-Tariff subsidy and strong Scottish Government policy for renewable power generation. This is a novelty, adding to the significant scale of landscape change to Scotland's uplands caused during the post-war expansion of large-scale hydro, and other policy-led governmental initiatives, such as afforestation. The drive to more small hydro schemes appears to have emerged without any strategic guidance on location, and some of this development is evidently not of a good quality.
  
12. **The impact of the proposed development** There is a presumption that small-scale hydro means only modest impacts of concern for landscape and its enjoyment. While this may sometimes be the case, development on the scale proposed has to be challenged in settings of highest landscape and recreational value such as Etive. Assessment by the applicant of the proposed group of developments follows the conventional LVIA approach, which is weak in assessing the implications for open-air recreation, as noted below, but the main reasons behind challenge to these proposals are as follows.
  - A major concern is the scale and ambition of the project. The seven schemes are deployed at the significant lateral tributaries of the River Etive beyond the initial steep-sided entry to the Glen, and they effectively occupy both sides of the middle and southern parts of the glen, as far as the head of the sea-loch. This is an expansive ambition, which on its own should be a reason for refusal, given the national significance of this setting.
  - While the individual components of each scheme – say the intakes and generation buildings – are not huge, each of the seven schemes is likely to have impacts over a wide area. Developments of this kind are constructed impositions, and, collectively and by adjacency, the proposals will bring change of a new kind into the glen along much of its length. These are changes that are disruptive to the existing pattern of conventional built development, both in respect of purpose and the character of the constructions, and thereby the more noticeable and discordant. The integrity of the present landscape is therefore challenged.
  - The overall visual outcome of the whole project is rated in the EIS as having limited impact in the long term, but there is more constructional change involved than is conceded in the landscape analysis, the main civil engineering works being for the buried pipelines or penstocks and the related access tracks. Each of the seven proposals will have a permanent access track running parallel to the penstock. In some cases, parts of existing estate tracks will be upgraded and, on the west side of the glen, forestry roads will make a contribution. Initially these tracks will have to carry heavy loads of pipelines and needed materials to their place of burial or use This is followed

by the burial process and reshaping and restoration of the disturbed ground, mainly it seems, using topsoil and turves, also leaving a robust access track for maintenance needs and constructed to a good standard. This is tricky ground for restoration; local climate can be harsh, the steepness of the terrain varied, likewise the nature of the substrate, which will mainly comprise ill-sorted glacial debris. All these uncertainties of terrain mean that the finished nature of the work will largely be devised on site at the time of installation. The fact that SNH has concerns about uncertain outcomes is clear in its requirement for a Landscape Clerk of Works and a Construction Environmental Method Plan. There is not enough in the application papers on how restoration will be achieved and recovery monitored over the years ahead.

- LVIA assessments tend to rate some of the post-construction visual impacts as being moderate to significant in the short-term, but reducing over time to a lower level of visual impact, once recovery has been achieved. However, we have no time-scale for such improvement, and no-one is saying that the visual impact these constructions will somehow vanish. The reality is that the installation process has much uncertainty. The problem for Glen Etive is the widespread distribution of these 'tracks', and their length (the total overall length is estimated at around 12km) given the number of schemes. The risk for longer-term damage to these landscapes is too high to allow for consent.
  - Another aspect of construction is that while visitors on the bottom of the glen may be more concealed from some of the penstock impacts, views of them by the active recreational visitor will quite often be from above, viewing across open country, from ridges and high tops, providing a quite different perspective to that experienced from lower ground. When climber/walkers are on high ground, their perspective and expectations of a more pristine and unspoiled setting are at their highest and the top ends of some of these work corridors do enter wild land.
  - On lower ground there is significant proximity between the new hydro structures and existing property, as well as in views from the road. The tables of closeness to existing dwellings in the different EIS statements are instructive in exposing the degree of proximity to property. Another unclear issue is that of power distribution: the plan is for an under-ground cable to carry the power out of the glen to the closest grid point. But this is lightly discussed with no indication of the routing, and we need to know whether there is a consent for grid connection, and what any alternative options might be. Borrow pits are mentioned with some general indication of location, but the scale of excavation needed and proposals for remedial landscaping are lacking.
  - The generating capacity for the seven proposals at application stage adds up to just under 7MW, which is not significant at the national level to justify the projected adverse effects on an extensive area of the NSA.
13. I commented above on the limitations of the standard LVIA assessment procedure in connecting with the outdoor recreation experience, and the range of experiential factors that drive the enjoyment of participants in open-air recreation.
- As noted above, the enjoyment experience from open-air recreation is a wide-ranging construct that ranges from some visitors' commitment to technically challenging activities with high personal satisfactions through achievement, onwards to those attracted by the aesthetic and environmental factors. Individual's response to these aesthetic and other experiential elements of the recreational experience will vary, but these intangible factors are critical to their enjoyment. The outdoor recreational experience in this setting normally involves a journey, with the

participant moving around the area throughout their visit (whether driving the single track road or walking on high ground) and the participants themselves thereby experience the impacts from different perspectives and also have a cumulative experience.

- Open-air recreation as a key public interest is often dismissed in renewables debate as being part of the economic and related issues of EIAs, as if it were of little significance beyond the ringing of cash registers, when it is at the heart of why society has policies and mechanisms to safeguard fine landscapes. Landscape protection is for people and the values they hold for special places: indeed, this people and values-based approach is central to SNH's main landscape policy statement.
- Finally, the separate ES assessments of impact, done project by project, have to be seen against their cumulative effects, which is limited here by the 5km boundaries used in the analysis. Assessment of these impacts needs a bigger picture approach to the whole of the developer's package of proposals.

## SNH's comments

14. The SNH submission asserts that the applicant's proposals do not challenge the integrity or the special qualities of the NSA designation. I disagree as follows:

- The word *integrity* is important to the first test in the SPP2 policy guidance on care of nationally protected areas (see footnote 7 on the next page). SNH's own interpretation of this word is to be found in its *Landscape Policy Framework*. Here, the text states "...Overall integrity is defined as the wholeness of the area, the unity or soundness of the whole being unimpaired, recognising that the entire area of the designation is valued and adverse effects to part of it is damage to the unity or soundness of the whole"[\[6\]](#). The emphasis here is with aspects of completeness or wholeness, but there are other more subtle resonances in this complex word (*integrity*) in respect of *sustaining quality and merit*. The clutch of schemes proposed by the applicant will significantly impair the landscape of Glen Etive (as described above) and given that Etive lies at the heart of the highly-rated mountain massifs of Glen Coe and Blackmount the integrity of the NSA designation will, by SNH's definition, be impaired.
- SNH also, and without explanation, states that the special qualities of the designated area will not be impaired. Identification of the special qualities of designated landscapes has been a recent initiative by SNH, which has good intentions: first, to supplement (but it should not replace) the original but sometimes limited formal designation statements, as set out in *Scotland's Scenic Heritage*, published originally by the former Countryside Commission for Scotland in 1978. Second, the aim is to provide a basis for better understanding of and commitment to the care of the NSA suite. With the arrival of the special quality listings, it has become common practice by developers to take these lists as a series of obstacles to be disposed-of en route to consent. It cannot be the intention of the special qualities approach to present a dismantled account of the protected area, because it is the overall merit of what is being protected by designation that counts, also how these components interact, the whole being more than the sum of these



elements. This statement from SNH is incomplete, and it also sets aside concern about damage to the enjoyment of the outdoors.

## **Conclusions**

15. In summary, the main points argued above and some final conclusions are as follows.

- The scale of this proposal and its prospective impacts on and risks for the Glen Etive landscapes and their enjoyment are such that the seven applications should not be consented, given the high quality landscape and recreational value of this glen. This is a case of national significance.
- In the introductory paragraphs I set down a summary account of the landscape and recreational value of Glen Etive, and how protection for our finest landscapes evolved, a process that has at times been fraught, with weak protection in the past for some of these special places. But we now have in national planning policies a clear stance for the care of these special areas, as set down below<sup>[7]</sup>.
- In striking the wider national policy balance, the drive to renewables stands high. The second test in Scottish Planning Policy for designated areas can allow development in nationally designated areas where the national designation interest is clearly outweighed by other national social or environmental benefits. However, the projected generation output for the seven schemes only adds up to close on 7MW, which is not a sufficient output to justify deployment of the second test.
- On the basis of arguments set out above, I disagree with the comments from SNH on integrity and special qualities.
- Finally, the format and purpose of this set of applications is not clear: there are seven adjacent applications for hydro-power generation, and these are treated separately in the EIA analysis. There are indications of this being an integrated venture, but there is no formal application for such a project, which appears to be a 'major development' in planning terms. While I have aimed to present an overall analysis, I am objecting to the seven individual projects.

John W Mackay

4 August 2018

<sup>[1]</sup> *In two reports to Government, under the Chairmanship of Sir Douglas Ramsay, the first being the report on the surveys to identify candidate areas, the second on management arrangements.*

<sup>[2]</sup> *The reasons for lack of action in the late 1940's for national parks in Scotland reflect the political reality of the day rather than there being any question about their merit: priority was given to the pressing social and economic priorities to revitalise the post-war economy and to improve living conditions in the central belt, likewise in the north, where the local authorities were in very weak*

*economic position at that time.*

[3] *One was largely omitted from the NSA suite on account of the adverse impacts of hydro development.*

[4] *'...we want to continue our protection of our wildest landscapes – wild land is a nationally important asset.'*

[5] *In the 1949 National Parks legislation the definition of such Parks set the pattern of linking care for natural beauty with its enjoyment. At s.5(1) the purposes of National Parks are '...for the purpose of preserving and enhancing the natural beauty of the areas specified in the following subsection, and for the purpose of promoting their enjoyment by the public'.*

[6] *To be found at SNH's Landscape Policy Framework, Annex A, para A12*

[7] *Development that affects a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve should only be permitted where:*

- *the objectives of designation and the overall integrity of the area will not be compromised;*  
*or*
- *any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.*

## **Category**

1. National Parks

## **Tags**

1. landscape
2. planning
3. renewables

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