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By email to: eplanning@highland.gov.uk

Ms Lucy Prins
Planning & Building Standards
The Highland Council
Charles Kennedy Building
Achintore Road
Fort William
PH33 6RQ

7th November 2018

Dear Ms Prins

**Proposal to construct and operate a run-of-river Hydro scheme (Scheme 3 - Allt Coire an Eoin),
Land 685M SE Of Nevis Range, Torlundy, Fort William.**

Planning reference: 18/04647/FUL

Mountaineering Scotland has assessed the proposal, for its operational phase, in terms of its likely effect upon mountain assets and mountaineering activities. We have serious concerns about the impact of this major civil engineering project in a sensitive upland location. It pushes development ever higher and into an area above the current development and we urge The Highland Council, if it has any doubts at all about the impact of this scheme on the landscape, to refuse planning permission.

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.

Visual Impact of construction access tracks, intake weir and penstock route.

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. This assessment should be read in the context of this being an analysis from a mountaineering perspective.

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 and where they are close to popular hillwalking and climbing areas.

The Allt Coire an Eoin proposal is an incursion into the Wild Land Area and. It lies beyond the existing hydropower infrastructure in an area that is untouched, with a scenic run of water over a fall. The development has a short penstock to the existing hydropower infrastructure from the intake weir, which will sit below bank height.

However, this route has to go through thin, peaty soils, over a lip of rock and down a steep slope, visible from the path below. It will reduce the flow down the rocky falls below which is a scenic component of the walk up from the built-up area into the Wild land Area, the gateway to it.

It is our understanding that Wild Land Areas are of national importance as the National Planning Framework 3 in section 4.4 states: "We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset." It therefore appears to be of greater value to the Scottish Government than the Highland-wide Development Plan recognises with its local/regional designation.

It is not entirely clear from the Environmental Report or from the Highland-wide Development Plan Proposals Map if this location is situated in the National Scenic Area, in an area identified as of National Importance or of International Importance. Since it lies so close then we expect The Highland Council to look closely at the visual impact of the proposal on these important designations.

We note that the Environmental Report, in the section on Intake Construction, states that the ground around the intake would be restored to match a pre-construction state, with natural stone used to protect the structure. We ask The Highland Council to give protection to the landscape by stipulating in planning conditions that no bare concrete surfaces will be exposed, and will be faced with local stone, cobbles and turves. Intake infrastructure can stand prominent and obvious in a natural highland landscape, and conditions that mitigate the visual effect of metal railings and pipework would be beneficial.

The existing track up to The Grey Corries lies on the eastern side of the river, which is the main route in to the hill, and a shoulder of hill may screen the intake from view. But as stated above, the route of the penstock, although fairly short, is steep and on thin, fragile soils and will be plainly visible to walkers making their way into the hills.

The assumption in the Environmental Report is that restoration will leave no trace. The reality of turning paper concepts of restoration into reality with heavy machinery is evident on hydropower schemes throughout the Highlands. There are serious questions to answer regarding the ability to create a temporary construction access track on such steep and rocky ground, and then to reinstate the landform, leaving no trace.

We request that The Highland Council consider the implications of failure to achieve this restoration and the means available to the Council to ensure that the wild qualities of the landscape are maintained for future generations to enjoy.

We recommend the Precautionary Principle be applied where doubts exist.

Yours sincerely

A solid black rectangular box used to redact the signature of Stuart Younie.

Stuart Younie
CEO, Mountaineering Scotland