



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Section 36 Branch
Energy Consents

Dear Ms Clark

Re: Kildermorie Hydroelectric Scheme Preliminary Scoping Review, December 2008

Scope of Concern

The Mountaineering Council of Scotland (MCoFS) is the representative body for hill walkers, climbers and ski-tourers. As the only national representative body of the sport of mountaineering in Scotland, we have 10,000 members, and are recognised by the Scottish Government as representing the interests of all mountaineers.

Recreation

The MCoFS is concerned that there is no source of recreation information listed for the statement made in section 1.4.1. The Land Reform (Scotland) Act 2003 enshrined in law the right of responsible access to most land and inland water. It is not dependent on following promoted routes. Many people enjoy accessing areas not followed by such routes. This raises the issue that using the term "recreation routes" as in 4.4.9 is very subjective, hence MCoFS has some concerns about the methods used in the consultations referred to in this section; "consultations would be carried out to establish the importance and the use of the area for recreation." Munros, Corbetts and a few other mountains are popular. Despite the claim in 4.4.7 that there are "no peaks in close proximity," the nearest Corbetts Carn Chuinneag is 2 km, Beinn a Chaisteil about 8km and Munro Ben Wyvis is about 10 km. The map shows that a potentially attractive route to the former would be from the south-east via the track along Gleann Mhurre that forms part of the development under consideration. The MCoFS recognises the importance of public safety. The area restricted to the public for recreation should be kept to a minimum and the Land Reform (Scotland) 2003 needs to be taken fully into consideration alongside the Scottish Outdoor Access Code. The access track should not be considered as part of the construction site, and therefore closed to access. If there is genuine concern for recreational access along the track during construction phase, then the upgrading and construction of these tracks, must take continued recreational access into account. Techniques using pedestrian / cyclist "passing places" such as at the end of the Glen Etive road for forestry operations should be used, and mutual care be promoted to drivers of construction vehicles and those taking recreation.

Landscape and Wild Land Character

The site is <3km from an AGLV and the majority of the project in an SNH Search Area for Wild Land. Section 4.4.10 states that, "any potential adverse impacts on recreation or existing wild land characteristics ... be kept to a minimum." This is not achievable with a number of statements made in other sections of the document. An important quality of this landscape is stated in 4.4.6 as the "lack of human features to draw the eye." The reservoir drawdown zone, dam and tracks all remove this characteristic. The Highland Renewable Energy Strategy (HRES) states under the hydro-electricity section 4.2 on Landscape Character: "minimise the impact on the "wildness" of an area." The wildness character needs careful consideration. The addition of tracks are a significant impact on the wild character of this area, and tracks that are not shown to be absolutely necessary do not fulfil the requirement to minimise the landscape impact. This strategy requirement is not fulfilled in the scoping report at 3.5.1 where it is stated that "tracks would be reinstated or

downsized as appropriate on completion of construction activities to leave permanent track to the minor intakes.” The branch tracks off the main glen track should be fully reinstated, with detailed method statement supplied as part of the permission application. This is required under the HRES section 4.2 under “Access Tracks” and the statement that “preferably, access tracks to weirs should be reinstated once the construction phase has been completed.” The MCofS regards tracks to intakes in the same way. They are a major threat to landscape, biodiversity and soil impacts. Detailed plans for their location, construction (including methods and dimensions) would be expected in the full EIA. The MCofS would expect to see minimal permanent tracks beyond the construction phase, and this would apply to the proposed permanent tracks that link the glen-dam track to the intakes. The MCofS would be likely to object to the permanence of such tracks. During the operational phase it is unlikely that heavy maintenance or regular traffic would need access to the intakes, hence minimising the impact of the development should require either that they are reinstated post-construction or that temporary tracking be used during the construction phase to permit recovery after removal. This could be similar to the techniques being used at the Loch Eilde Mor HEP along the buried pipeline. The cumulative impacts (HRES 4.2) need taken fully into consideration, including those from different types of development such as wind farms (including their infrastructure such as tracks) and other hydro schemes in the area.

Biodiversity

In line with the HRES, the possible negative effects on plants and animals would be expected to be considered, including all of internationally, nationally and locally designated species as well as LBAP species and habitats. Timing and methods of construction should be based on the findings. We would expect that the full plan would go beyond the statement in 4.3.13 that “contractors could be encouraged to keep ground and vegetation disturbance to the minimum practicable.” A full method plan is required to direct contractors how to achieve the minimal disturbance as contractors are often not experienced in such subtleties, and should not be expected to take the responsibility for this important issue.

Other Factors

HRES 4.2 states that the targets of the development must be considered, including CO2 production. Any gain in reduction in CO2 through the development being a renewable energy needs offset against its release by disruption of peat soils such as in track construction, this can also affect an extended area by changing the hydrology. It would be expected that direct and indirect “disturbance to and changes in soils within the site/development area should be avoided” (HRES 4.2).

The MCofS are concerned that the cable connections through Semi-natural Woodland on Ancient and Long-established Sites are not included in report, however are integral to development.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus
Access & Conservation Officer