



The MOUNTAINEERING COUNCIL of SCOTLAND

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Response from the Mountaineering Council of Scotland on the Environment Statement on the Loch Eilde Mor Proposed HEP.

Introduction To The Mountaineering Council Of Scotland

The Mountaineering Council of Scotland (MCofS) is the representative body for hill walkers, climbers and ski-tourers and we aim to represent the interests of all mountaineers. As the only national representative body of the sport of mountaineering in Scotland, we have 10,000 members, with 127 Scottish hill walking and climbing clubs affiliated. Our quarterly magazine *The Scottish Mountaineer* has a circulation of 15,000, and our website attracts huge interest in both Scotland and abroad, and has been recently re-launched. Our office in Perth is staffed by four officers and an administrative team. Much of our work is carried out by volunteers, and we have a central pool of around 60 people from all walks of life, who offer a range of skills and expertise. We are financed by membership subscriptions and we receive investment from sportscotland, Scottish Natural Heritage, the Scottish Mountaineering Trust and the British Mountaineering Council.

General Comments

The MCofS supports endeavours to reduce carbon emissions and to enhance energy efficiency and the use of renewable sources of energy, particularly where there is micro generation and schemes which generate local supplies of electricity. We scrutinise each case on its individual merits and carefully balance the energy gain or efficiency against the environmental impact. We particularly support run of the river HEPs, providing there is no detrimental impact on the landscape and ecosystem.

We are familiar with the policies and strategic guidance of the Highland Structure Plan and the Highland Council Renewable Energy Strategy and Planning Guidelines [2006], having responded extensively to both documents during their consultation periods.

The proposals for the Loch Eilde Mor scheme concern us in that there is little energy gain [a mere 5000kW] for a fair amount of local disruption over an extended period of time. We also note that the scheme affects an area of NSA and SSSI. We are particularly opposed to schemes of this nature which impact on SSSIs. The original scheme in this area was constructed in the very early years of the nineteenth century when there were no landscape designations. So for this reason we also feel that the original works and pipeline should be removed and remediation and restorative work should be carried out. We note the ambition to create a hydro heritage trail; this could be achieved by photographic displays and montages in a small visitor centre. We note that the new pipeline will be underground except for a length of around 600 metres, this will be where the pipeline extends over difficult ground and we consider that this will be clearly visible and unattractive, and therefore damage the landscape quality of the National Scenic Area (NSA).

Our main concerns are significant and include the effect on access and recreation, landscape, biodiversity, and the impact on tourism and the tourist economy.

Access And Recreation

It is openly acknowledged at various points in this Environmental Statement that there will be impact [Appendix J Land Use, 2.8 Access] and restriction [Appendix J 4.7 and Table 3] to recreation activities, especially hill walking and walking, during the construction phase. There is totally inadequate mitigation and compensation for this. The stated intention [for example at Appendix A Construction Method Statement Table 3.3 Potential Hazards and Mitigation Measures, Item 7] to provide signage, scheduling and notification will be unacceptable and inappropriate. There is no reference in the document to the Land Reform [Scotland] Act 2003, specifically reference in terms of public access. Over the prolonged period of construction there must be incorporated appropriate facilities and arrangements to ensure hill walkers have continued access to traditional routes. The proposed arrangements would restrict access over three seasons of activity [presumably two summers and one winter] which is unacceptable and which the access legislation does not condone. The MCofS would be agreeable to discussing alternatives with developers in order to reach acceptable outcomes. It would be unacceptable to prevent access up the Allt Coire na Ba from either the Mamore Lodge direction or the Loch Eilde Mor direction. Additionally, the routes from Kinlochmore to Coire an Lochain and Loch Eilde Mor are extremely popular and should be kept open; in particular the crossing point at the staggered track junction at GR 208 635. In addition, there is no reference to the Core Path Network of the area which should shortly be finalised for submission to Ministers later in 2008. These schemes must impact on the implementation of these plans yet there is no discussion or indication of how this can be accommodated. There is no indication of working patterns. Most, but by no means all, recreational walkers and visitors would take access at weekends, when it may be the case that no construction work is taking place. It would be unacceptable to restrict access when there is no on site activity. Numerous forestry operations involving transporting heavy loads on large vehicles along tracks are conducted while maintaining access for walkers. MCofS would need to have continued access along the existing tracks and paths guaranteed. We would be happy to work with the developer to promote safe behaviour.

Landscape

This site is within an important NSA, the landscape of which attracts settlement in the local communities, tourism and hill walking visitors. The MCofS is one of several organisations that resist the proliferation of hill track construction in Scotland. The Environment Statement indicates that access in the area will be improved by the construction of new paths; this is not at all necessary and is a spurious conclusion. The existing paths, subject to some maintenance in places, serve the access needs of the area very well. Furthermore, the existing paths are more than adequate to satisfy the needs of the Core Path planning of the area outside the immediate vicinity of the villages. A proliferation of upland tracks, especially where these may be poorly constructed and / or unattractive and intended for vehicular use, are very detrimental to the scenic qualities of a landscape and have substantial impact. We are very apprehensive about any permanent new tracks, especially those intended for vehicular use, their appearance and quality, their maintenance and how they blend into the landscape. It is noted that there is planned to be very significant land-take by new access routes. It is vital that all tracks constructed or widened are fully reinstated by the end of the project. This will involve a great deal of reinstatement of tracks towards its termination and this work must be guaranteed to be of high quality and should be appraised before signing off the project.

Biodiversity

We endorse the mitigation proposed to avoid any disturbance to otter, bat and pine marten populations but we have concerns over the water vole populations in the vicinity of Loch Eilde Beag, despite the stated intention to provide compensating habitat. These mammals are designated under Schedule 5 of the Wildlife and Countryside Act 1981. Damage to existing colonies will affect dispersal and where colonies are isolated from others there will be no interbreeding and significant extinction of this endangered

species from the area could result. There should be ongoing monitoring of the effectiveness of these mitigating measures during construction and for a period after sign off of the project.

Tourism And The Tourist Economy

The Environment Statement states that Alcan has been positive for the local economy but this development could be detrimental in the short term. It is also stated that there will be some continued local employment after the construction period, but this is very insignificant. It is important to the tourist economy and the MCofS that communities such as Kinlochleven continue to have a thriving economy and provide accommodation and facilities, such as shops and the Ice Factor. As noted above, there are several references in the Environmental Statement to the fact that there will be restriction on recreational activities during the lengthy construction period. It can safely be anticipated that the numbers of visitors to the area will decline during this time, due to the construction noise, any “restriction on access” and the general despoliation and soiling associated with heavy engineering works. Any reduction in the numbers of visitors will impact on the as yet small economy of the village, which depends on small very local businesses. These can be viable only if they have continuous and steady positive cash flow and income; they cannot survive lean periods in the same way as larger businesses as they simply do not have the resources and/or alternative premises elsewhere. The stated “long term positive impact for the local community” is unproven and a spurious mitigation measure. In recent years, Kinlochleven has increasingly been seen as a growing tourist destination and this adverse impact during the construction phase could jeopardise success at this embryonic stage in its development. It should be appreciated that an attraction such as a HEP heritage trail is unlikely to be a major reason for tourists to come to Scotland, and that such attractions tend to be visited only once whereas, for example, the Ice Factor and good accommodation get countless repeat visits – the true test of a successful tourist economy. Any restrictions on access will strongly discourage hill walkers and ramblers from using the area; indeed hill walkers will probably choose to approach the Mamores from the north. This will benefit the economy of Fort William instead, but, of greater concern to us, is the fact that several of these mountains are more difficult to tackle from the north. Some approaches are longer and more complex and descents are more difficult, especially in winter. This raises safety concerns. The MCofS would of course be proactive in alerting and advising our members of this under these circumstances.

Additional Points

Section 4 Environmental Risk Assessment and Mitigation Paragraph 4.1. This paragraph is very unclear and some elucidation would be appreciated.

Yours sincerely

Beryl Leatherland
Access and Conservation Committee
Mountaineering Council of Scotland