



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Sir / Madam

Invermark Hydro Schemes Scoping

Thank you for your invitation for the Mountaineering Council of Scotland to respond to the EIA Scoping Study. The MCoS main interests in planning applications, such as this hydro scheme are the potential impacts on recreation access, visual amenity and landscape. The Invermark area is a popular location for mountaineers, including for those travelling through the area to other hills nearby such as through Glen Mark to reach Mount Keen and winter climbing on the cliffs above Carlochy and on Craig Maskeldie.

There are two main concerns in this context. Firstly, there should be adequate consideration taken of wildness quality, and therefore a presumption against further proliferation of hill track construction or significant "upgrades." Secondly, recreational access should not be unnecessarily impeded during either the construction or operational phases. Appropriate consideration of these are required under the Land Reform (Scotland) Act 2003 and the Scottish Planning Policy document.

1. Falls Of Unich

This scheme would greatly impact on the enjoyment of the Falls of Damff, but the MCoS does not have any records indicating how popular this walk is. An indication of this would be valuable for assessing the impact on visual amenity. The powerhouse and pipelines are not considered to be of long-term concern due to their close association with developments at Inchgrudie and plans to bury them, respectively. Our primary concern is the route of construction traffic access and the necessity for track construction or upgrade to the dam/intake. The Shank of Invergrudie would seem to be the most logical route, although it is of concern that this is up a prominent ridge and therefore is obvious in the landscape. It also needs carefully considered the additional landscape impact of any upgrade or re-alignment that would be required for this track.

2. Water of Lee

There are no matters of interest particularly regarding this scheme.

3. Water of Mark

The track access that is likely required to this location would have a significant effect on the wildness quality of upper Glen Mark that at present has no human influence or view of such. It would therefore profoundly change the landscape and visual amenity of this glen and significantly reduce the wildness quality. This is a material consideration for planning applications, and would mean a creep of modern development into an untouched topographically enclosed area in a broader area where tracks are already common. The cumulative impacts would therefore also be of great concern.

4. Invermark

Concerns over these micro schemes would be primarily based on the need for upgrading of tracks, additional tracks and any intakes in the remoter areas. It is unclear from the map the extent of these that may be proposed, and cumulative impact would also be of concern. Additionally, it would need to be planned to ensure continued access along Glen Mark and towards Mount Keen throughout construction an operational phase.

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

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer