



THE MOUNTAINEERING COUNCIL OF SCOTLAND

The Old Granary
West Mill Street
Perth PH1 5QP
01738 493 944
(messages only)
hebe@mcofs.org.uk
www.mcofs.org.uk

10/11/10

econsentsadmin@scotland.gsi.gov.uk

Dear Sir / Madam

Section 36 Scoping for Talladale Hydro Scheme – MCoFS Response

Please accept these comments from the Mountaineering Council of Scotland (MCoFS) on the Viking wind farm. We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski tourers. We have over 10,000 members and aim to represent the interests of all the 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment.

2 Scheme Description

Appropriately high profile should be given to the constraints of the number of designations on which the site is proposed (NSA, SSSI, SAC) and assessments will be required of the impacts on the qualities and features for which the area was designated.

2.2.1 The MCoFS welcomes the plan to bury all pipelines

2.4.1 The MCoFS is concerned about the prospect of only partial decommissioning should the scheme cease operation. One of the elements of the scheme that would have greatest visual impacts are any additional permanent access tracks. These must be planned to be removed as part of the decommissioning plan.

3 Impacts on People

3.2 Planning Context

The SPP references do not reflect the planning context in an unbiased manner. The planning context must be stated objectively, or not at all. Of equal importance to those quoted are the SPP paragraphs 125 to 148, particularly the sections on the importance of landscapes in 127 and on wildness relating to limit / capacity in 128.

3.3 Landscape and Recreation

3.3.2

As this paragraph illustrates, this is a hugely important area for healthy outdoor activity. More likely to be have views affected than some on the list is the Corbett Beinn Airigh Charr (approximately 6 km north).

3.3.3

The consideration of rights of way, as illustrated in the book *Scottish Hill Tracks* is important, however, of equal importance under the Land Reform (Scotland) 2003 is access to almost all land in Scotland irrespective of whether it is mapped as a path or not. This must be considered in assumptions about access.

3.3.7

One of the greatest impacts of the type of scheme as that planned is the construction of access tracks. There should be a presumption in favour of using temporary tracks unless it can be shown that it is absolutely necessary to retain tracks as permanent due to the high volume of continued traffic and / or weight of vehicles used for maintenance. There are numerous examples of use of temporary tracks for construction and their removal for the operational phase due to the need only to visit occasionally for maintenance and in lightweight vehicles. Consideration of removal of tracks after the construction phased should be genuinely assessed, as should an intermediate impact option of 'green tracks' remaining as is planned in the scheme at Glen Falloch. The MCoS considers that the estimated one per month visits (3.5.3) does not warrant the impacts of a permanent track. This is particularly important as the areas is wholly within and surrounded by an NSA.

4 Impacts on Natural Resources and Natural Cultural Heritage

4.4 Landscape and Visual Impact

4.4.1

SNHs Search Areas for Wild Land (SAWLs) were never intended as a pseudo-designation, but as a broad-brush indication of the likely locations of larger area of core wild land. Developments outwith SAWLs cannot therefore be claimed to not impacting upon wild land, or the wildness character of the landscape, as identified in 4.4.2 where it is noted the area is "largely devoid of human intervention." The development is proposed in an area of significant wildness, and paragraph 128 of the SPP should be fully considered.

4.4.6

Any tracks or intakes would be disproportionately impacting on visual impact due to the naturalness of the setting. This may include even views from the north of Loch Maree as well as from the road and surrounding hills.

4.4.7

The impacts of tracks should not be down-played in the assessment. The assessment must also include the comparative impacts of options other than permanent tracks. This should include removal of the new tracks on the open hillside after construction phase and the middle-road approach of a 'green road.'

4.4.8

The assessment should include popular routes in addition to Scotways-promoted routes.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer

cc. bill.macgregor@rwe.com