



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

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Convenor

Loch Lomond and the Trossachs National Park Authority
Carrochan
Carrochan Road
Balloch G83 8EG
Case officer: Julie Gray

30th July 2017

Dear Ms Gray

Application 2017/0119/DET, construction of a hydro scheme at Ben More Farm, Crianlarich, Stirling

I am writing on behalf of the Scottish Wild Land Group to **OBJECT** to this proposal for a run of the river hydro scheme at this location. Our objection is largely based on the proposal to retain the construction access track. We consider that this does not comply with the national park's policy REP 1 Renewable Energy Within the Park, Hydro Energy, which is one of the supporting policies for the current development plan. We also **conditionally object** to the proposal until the developer has made available an Access Plan in line with the SOAC and a CEMP for public scrutiny. We have additional concerns associated with this proposal and these are included below.

The proposed development site is within a very sensitive location and in our opinion there is the potential for permanent adverse visual impact. The site is within the Loch Lomond and the Trossachs National Park, and in close proximity to the Ben More and Ben Ledi Wild Land Area [WLA] and the Breadalbane- Schiehallion WLA. In addition the construction and operational phases of the proposal have the potential to impact adversely on the qualifying species of the River Tay SAC and the Ben More and Stob Binnein SSSI.

Visual Impact: the Landscape Appraisal and accompanying illustrations assess the final scheme as having a low impact and yet only the final impact from the A85 has been considered. The perhaps greater impact from the A82 has been ignored. As one approaches the National Park from the North the Ben More/Stob Binnein massif is a dominant feature and the aspect of the north face of Ben More sweeping down into the glen is impressive, particularly from sweeping stretches of road from Tyndrum to Crianlarich. A scar across its flanks would be detrimental. There has been no assessment of the impacts on visual receptors along the A82 to the north and this is a major omission.

The greatest long term impact from this scheme would be the proposed permanent access track. Not only would this not comply with REP 1 but also the construction would be against best practice



guidelines promoted in the SNH document “Constructed Tracks in the Scottish Uplands”, June 2013. We wonder whether the developer has considered the potential for land slips to be provoked by the line of the track traversing across steep slopes, only careful engineering would avoid this in this fairly steep location and given the increasing tendency to see such landslips in the vicinity in recent years this might be expected to be a concern. Such tracks are constructed using cut and fill methods which should be properly restored to avoid erosion and slumping, which are common results of such methods.

The proposed permanent track may also impact on drainage and groundwater flow sufficiently to impair Groundwater Dependent Terrestrial Ecosystems [GWDTE] that are protected by the Water Framework Directives; we are doubtful that the minor re-routing mentioned will be adequate.

We are doubtful that the landscape impact would be sufficiently ameliorated by restoration to an ATV track over the long term. A 2 metre wide ATV track is proposed for the permanent track and it is difficult to envisage how the difficult restoration involved would be achieved in a cost-effective way in this location. There would need to be monitoring and enforcement of this by the planning authority. We note that the access track for the recently completed nearby Ben More scheme was to be completely restored and vegetation to be reinstated and this is progressing fairly well although a few more years will be needed to fully evaluate the success of this. We would also question whether this access track needs to be retained.

The final finish [concrete, natural stone, local stone etc] and appearance of the intake structures is not described.

We appreciate that during the construction phase of any development there will be undesirable visual and other impacts, but the long term permanent impacts depend on the quality of restoration work and monitoring by the planning authority [including enforcement if necessary] and, to a lesser extent, once commissioned, operational considerations.

The Landscape Appraisal rather underplays the potential for cumulative impacts from the other hydro schemes in the area, specifically the Eassan Allt Eassan and Auchesan, the Allt Coire Chaorach and the existing Ben More schemes. This is a popular tourist area on the fringe of the Park and all these schemes contribute to the perceived over-industrialisation of the area, detracting from its value as a tourist destination. This is not justifiable especially considering the relatively small generating capacity of the scheme at 200kW.

EIA: The Benmore Farm hydropower scheme previously approved [2013/0311/DET] was the subject of an EIA following a screening opinion that was required because of the character, location and potential impacts of that proposed development. The environmental impacts of 2017/0119/DET are arguably greater but no Environmental Statement has been submitted and only a very brief EIA was put on the online planning portal on 26th July, after responses had been received and posted online. Is it the intention of the authority to alert these respondents to the existence of this EIA document to enable them to comment further? We do not agree that an EIA is not required in the case of the current proposal.

Construction Impacts: the CEMP and Method Statement are not available yet as documents for public scrutiny on the LLTNP online portal. Given the sensitivity of the site and its designations we consider that these should have been made available for submission with the documentation supplied to the planning authority at the application stage and for public examination.

In the CEMP we would expect to see details of cutting curves and their set aside maintenance, as well as the various soil layers so that the soil profile can be reinstated during restoration works.

There should also be an Ecological Clerk of Works appointed, preferably by the planning authority but invoiced to the developer, to oversee protection of the interests of any ground nesting birds on the site [no mention is made of any survey of these in the application] and to ensure silting of water courses is avoided as this may impact on the qualifying species of the River Tay SAC. No mention is made of any bird surveys in the application documents on the online portal, and the proposed construction periods will be during the breeding season which would result in disturbance and be unacceptable. Conditions should be set to cover the concerns expressed in this paragraph.

There should similarly be arrangements described to avoid and deal with any pollution from plant and machinery used on site that could pollute water systems. There does not appear to have been any submission from SNH that is available for access among the planning portal documents and we should have thought that consultation with SNH as a statutory body is needed.

No source of aggregate material is given. If there are to be borrow pits on site these should be detailed, their locations and number specified and the details of their restoration given.

Public Access: The development site is in the vicinity of a popular hill route onto two Munros. During both construction and plant operation after commissioning access would need to be maintained in line with the Scottish Outdoor Access Code. The developer does not appear to have submitted an Access Management Plan. This document should have been available for public scrutiny at the application stage and is considered by us to be part of the democratic process. The Access Plan should include procedures for communicating best practice and operational guidance to contractors and their employees to ensure smooth access is maintained and conflict avoided.

The documentation submitted by the developer contains reference to the “Scottish Mountaineering Council Guide”; this is a minor error, for accuracy the relevant guide for hillwalkers is published by the Scottish Mountaineering Trust, set up by the Scottish Mountaineering Club, an entirely different organisation.

Socio-economic impacts: the application does not discuss these aspects of the development except to mention that the income generated would ensure the sustainability of the family income for future generations. We would respectfully point out that the farming family would appear by us to be a tenant farmer as the owner is based in Aberdeenshire, and that in any case it cannot be assured that the younger members of the family will want or be able to take on the tenancy. In this context, we do not consider that the sustainability of the family income is a material planning consideration.

Should you have any queries about any of the points raised in this communication, please do not hesitate to contact me. I should appreciate acknowledgment of receipt of this objection.

Yours faithfully

Beryl Leatherland