



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

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Convenor

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Carrochan
Carrochan Road
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Case officer: Julie Gray

10th January 2019

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 confirm that we continue to **OBJECT** to this proposal for a run of the river hydro scheme at this location, in advance of tomorrow's expiry date. Our objection is due to the reasons we gave in our response of 30/07/2017.

We are still concerned about the retention of the proposed retention of a track [even as an access track] which we consider will have an adverse visual impact on the two Wild Land Areas [WLA] as we described in our previous communication. WLA is not a statutory designation but NPF3 recognises wild land as a "nationally important asset" and indicates that Scotland's landscapes merit strong protection. Scottish Planning Policy [SPP] goes on to describe how this should be achieved. This includes the identification of WLAs via the SNH map, and the need for development to "demonstrate that any significant effect on the qualities of these areas can be substantially overcome by siting design and other mitigation". We do not feel the developer has addressed these points in his proposals. The relevant paragraphs in SPP in this context are 193, 200 and 215.

In addition, there is no consideration of the cumulative impact of this scheme in association with the other schemes in its vicinity.

The plantation mentioned as a possible screen will be removed during the next few years so that protection will be removed – over the life of the hydro scheme this would only ever be considered to afford temporary screening in any case.

We are not convinced by the line of the proposed track using a natural shelf – this is narrow and the site is steep. The ground on this traverse of the north slopes of Ben More is quite sustained, it rises around 200 metres in about a kilometre, which gives a slope at 25 to 30 degrees at various points. This in itself makes acceptable restoration very difficult. Indeed, we have concerns regarding the prolonged safe operation of frequent helicopter lifts [as described although it is proposed to also use trucks, but the number of truck loads and helicopter lifts have not been quantified, to enable comparison] over such a steep slope and carrying large loads above a busy public road; the set



down area on the mountain would need to be large and protected on the downhill side, again introducing an engineering solution to this iconic mountain.

Although we have been through the new documents posted in December 2018, we note that there is still no Public Access Management Plan [for during the construction phase as well as during the operational phase]. This is a very popular hill route and there are several lines of ascent.

The Applicant has submitted more detail on how construction will be managed and vegetation protected – to some extent at least. However, there is a need for conditions to be set on this and of course monitoring to be done. There is no CEMP document.

Concerns over adverse impacts on the hydrology of the slope and the GWDTEs remain. The new document mentions “good practice” but no specific commitment to efforts to avoid silting of streams in the catchment of the River Fillan, so we think there is still potential for downstream water quality impacts.

Despite the fact that a couple of the points we raised in our previous communication have been discussed in the newly added documents on your planning portal our main objections still apply, so we ask that our objection is taken into account in your deliberations as well as this follow-up.

Kind regards

Beryl Leatherland