



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

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Convenor

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Dear Sir/Madam

Planning Applications for run of the river hydro power schemes in Glen Etive:

**Ref 18/05440/FUL [formerly 18/02741/FUL] on the Allt Mheuran
Ref 18/05439/FUL [formerly 18/02740/FUL] on the Allt Fhaolain**

Thank you for informing me that the previous applications for these two schemes had been withdrawn. However, I was disappointed that in your communication you did not simultaneously advise me that the developer had submitted alternative proposals; I should have appreciated this information directly from you rather than being made aware of it by a third party, causing me to have to contact you for details.

I submitted an objection on behalf of the Scottish Wild Land Group to you on 10/08/2018 in which I objected to the Allt Mheuran scheme and also commented on the Allt Fhaolain proposal. I re-state some of the points I made then here as well as including points arising from the new and revised documents.

SWLG objectives are to promote the conservation of wild land in Scotland, to promote public awareness of the problems facing wild land in Scotland, to promote and encourage the implementation of good planning policies and to co-operate with other bodies to promote our objectives.

Our members are generally in favour of renewable energy schemes and recognise their essential contribution to helping to decarbonise the global economy. We consider, however, that there must be a strategic, spatial and long term plan to assure achievable emission reductions in order to ensure that appropriate schemes in appropriate locations are identified. Such schemes should not impact adversely on the public interest and natural capital assets in other areas of the economy such as tourism, recreational interests [which help to address health and well being issues], biodiversity, effective land use and land use rights and responsibilities. Our members, and this is supported by recent separate public opinion surveys undertaken by, for example, the National Trust for Scotland and the John Muir Trust, do not support developments which have the potential to impact adversely on the important national resource of wild land.



Glen Etive is part of the Ben Nevis and Glencoe National Scenic Area [NSA] and is also in Wild Land Area 9 Loch Etive Mountains [WLA]. While WLA is not a statutory designation, the need to protect WLAs is recognised in National Planning Framework 3 [NPF3, June 2014] at paragraph 4.4. NPF3 recognises wild land as a nationally important asset and indicates that Scotland's landscapes merit strong protection. Scottish Planning Policy [SPP] sets out how this should be achieved. This includes the identification of WLAs via the Scottish Natural Heritage [SNH] map and the need for development to "demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation" in SPP paragraph 215. SPP recognises the landscape as a valued national asset and the role of planning "in protecting, enhancing and promoting access to Scotland's key environmental resources, whilst supporting their sustainable use" [paragraph 193].

For SWLG members, paragraph 200 of SPP is crucial:- "wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas".

The Glen Etive area has high nationally significant scenic importance and recreational value for tourists, hillwalkers, mountaineers, skiers, low level walking, canoeing and fishing interests. In addition there are cultural and historical associations. It is recognised that visiting and enjoying such areas contributes to physical and mental health and well-being. Excessive erosion of the scenic and wildness qualities of the area can be expected to reduce their appeal with consequent economic detriment to the economy of the area which might be more significant in public interest terms than the value of the trivial level of hydropower generation envisaged, and the very minor contribution of the proposed schemes to the important task of helping to ameliorate climate change. For these reasons SWLG believes it is totally inappropriate to contemplate industrialisation of this area on the scale proposed. If permitted, these proposals will result in significant detracting from the wild land qualities associated with this iconic area.

The seven schemes under consideration need to be considered as a whole and not individually in considering their cumulative impacts on the glen and surrounding areas. There will be permanent detracting from the visual and recreational amenity of the glen for a wide range of economically active visitors to this part of Scotland. Locogen figures 5.4 and 5.32 showing the ZTV of all intakes and powerhouses for the 7 schemes illustrate the extent to which these proposals will cumulatively introduce an industrialised element to WLA9 and impact on landscape character.

Proposal 18/05439/FUL: I note that the developer has altered the original proposal for the Allt Fhaolain burn in such a way as to largely help to eliminate the concerns of the Grampian Club and other users of the nearby climbers' hut; however there is remaining uncertainty over whether the landowner will agree to what is proposed regarding future water supply. Until this has been addressed then the members of the Grampian Club are in a difficult position as they cannot accept bookings for the hut until this is resolved, and should the landowner not agree then presumably current use of the hut cannot continue. We support the contents of SEPA's submission and all their requested conditions, particularly that described in paragraph 4.2. In respect of the freshwater- related regulatory requirements for this proposal, the developer has further work to do to ensure no downstream pollution via increased sediment burden and to give a high level of reassurance on this point; and in fact this is the case for all 7 schemes in this regard. We would respectfully suggest that THC should ensure that in addition the issue raised by SEPA in 6.2 is pursued to satisfaction.

Proposal 18/05440/FUL: The developer has amended the proposals for the scheme on the Allt Mheuran by reducing the two intakes to one and moving the intake downstream of the Robbers Falls. These changes are an improvement but sufficient concerns remain that we consider that we continue to **OBJECT** to this revised and re-submitted development proposal.

SWLG considers that the applications, despite recent changes, remain deficient in the following respects:

1. There is insufficient information in construction and design statements, especially concerning maintenance of water quality and silting prevention. The Dickins Hydro Resources Supplementary document for the CMS is a statement of good practice, it has not been specifically reflected in the plans for each scheme.
2. Small hydro schemes pose increasing concern for our members due to poor construction quality of access tracks which are often visually intrusive. There is some lack of clarity regarding whether individual tracks will be restored, reinstated or be part restored to become ATV tracks. ATV tracks can be unsuitable as there is a tendency to drive beyond the track and to disturb otherwise pristine ground leading to poaching, erosion and visual impact. There is a need for precise and specific track details for each scheme which could perhaps be supplied in a single document specifying construction details, restoration plans, the nature of any permanent tracks, how these will be maintained and how that would be funded.
3. There is no site-specific construction detail for access tracks along their entire length.
4. There is inadequate detail on borrow pits.
5. There are no details of proposed transmission lines. Ideally these would be undergrounded although issues similar to those associated with track construction and pipe laying are involved.
5. The Glen Etive road is narrow and rarely used by trucks, it can be busy at peak holiday periods, yet there is no Traffic Management Plan.
6. There is no Access Management Plan
7. It appears that structures will be finished as concrete, rather than using facings of local stone which would be visually more acceptable.

Should you have any queries about any of the above please do not hesitate to contact me.

Yours faithfully

Beryl Leatherland
Convenor SWLG

