



Campaigning for the Conservation of Wild Land in Scotland

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The Highland Council
Glenurquhart Road
Inverness IV3 5NX

10th August 2018

Dear Sir/Madam

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

Ref 18/02742/FUL on the Allt Chaorin

Ref 18/02741/FUL on the Allt Mheuran

Ref 18/02739/FUL on the Allt Ceitlin

I am writing to **OBJECT** to the above three schemes on behalf of the members of the Scottish Wild Land Group, [SWLG] Scotland's oldest and only volunteer-run wild land charity. We are also submitting a **comment** on the proposal described in **Ref 18/02740/FUL on the Allt Fhaolain**.

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 ensure achievable emission reductions in order to assure 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.

We have considered the several schemes planned for Glen Etive, and while we recognise that there is a case for objecting to all of them, due to their probable combined adverse cumulative impacts, we have decided to object to only the three schemes listed above and to comment [see below] on the scheme proposed for the Allt Fhaolain, ref 18/02740/FUL.

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 officially 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 environment 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”.

These mountain and glen areas have 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. For these reasons SWLG believes it is totally inappropriate to contemplate industrialisation of this area on the scale proposed.

In addition to their potential for reduction of the scenic amenity and recreational appeal of the area SWLG considers that the applications are deficient in the following respects:

1. There is insufficient consideration of the impacts on receptors who visit ridges and summits.
2. There is insufficient information in construction and design statements, especially concerning maintenance of water quality and silting prevention.
3. Ecological work is inadequate particularly impact assessment and mitigation.
4. Small hydro schemes pose increasing concern for our members due to poor construction quality of access tracks which are often visually intrusive. The applications do not refer to or seem to follow the excellent SNH guidance on Constructed Tracks in the Scottish Uplands [2015 version].
5. There is no site-specific construction detail for access tracks along their entire length.
6. Restoration plans for such tracks should be submitted along with details such as storage, maintenance and re-use of vegetated turves in order to contribute to the integrity of the local plant species and to avoid intrusion by species not typical of the habitats involved; such precise and essential detail has been omitted. An Ecological Clerk of Works should be employed.
7. There are no construction or restoration monitoring details; a Landscape Ecological Clerk of Works should be employed.
8. There is inadequate detail on borrow pits.

9. A full and realistic Access Management Plan is needed particularly because the construction period, should any of these schemes be consented, in this location is likely to be lengthy and weather dependent.

Comments for consideration on planning reference 18/02740/FUL, Allt Fhaolain hydro scheme.

While we recognise that this scheme has perhaps, provided the construction work is done sensitively and to a high environmental and scenic standard, limited potential for impacting adversely on the magnificent mountain cirque above the burn catchment, the proposal is of legitimate concern not only to the members of the Grampian Club but all who use their hut [Inbhirfhaolain at NN 158 507] and its surrounding area. The hut is used by a range of both Scottish and other hillgoers.

The members of this club are of the opinion that the construction proposal may result in alteration and contamination of the burn which is the water supply for the hut. This could be avoided by using a sophisticated and effective filtration system but this is not proposed by the developer. Our own members have made site visits to various hydro schemes throughout the Highlands and a feature of almost all of them is a failure by contractors to exercise due care and adhere to conditions set by planners on these aspects of construction. In addition there is a lack of oversight by developers on their contractors and a lack of resource in planning departments to enable them to monitor and enforce conditions.

It is proposed to locate the power house about 100 metres from the hut and hence there are concerns about noise levels. This should be addressed, through operating schedule adjustment perhaps.

In particular we are very surprised and disappointed that there has apparently been no detailed consultation with the Grampian Club office bearers about the proposal and mitigation of matters of concern. This is not in the spirit of public consultation and “front loading” as promoted by the Scottish Government.

We consider that the concerns of the Grampian Club are well founded and we support them. Before this scheme can be consented, there should be an urgent meeting between the developers, planners and the Club to address and satisfactorily resolve these matters.

Should you need any clarification on any of the points made above please do not hesitate to contact me.

Yours faithfully

Beryl Leatherland

Convenor SWLG