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Allt Ceitlein Hydro Scheme

Sent by email : epc.planning@highland.gov.uk

The John Muir Trust wishes to object to the proposed construction of the Allt Ceitlein Hydro Scheme. The site is within the Ben Nevis and Glen Coe National Scenic Area, the Glen Etive and Glen Fyne Special Protection Area and within Wild Land Area (WLA) 9 Loch Etive Mountains. The proposed development would have a generating capacity of up to 810 kilowatts. It would consist of three intake structures, for channelling water from the Allt Ceitlein river into a buried pipeline connecting the intake to a powerhouse with an outflow pipeline and a permanent access track to facilitate any maintenance during the operation of the development.

The proposed development is one of seven hydro schemes planned for the Glen by the same development company and as such must be considered as an individual application but also as a contributor to cumulative impact.

We would comment at this stage that much of our written Objection is similar in language and content to our Objections to Allt Mheuran and Allt na Chaoarainn given that much of the documentation submitted by the developer is the same for all schemes.

The John Muir Trust is the leading wild land conservation charity in the United Kingdom. Working with people and communities to conserve, campaign and inspire, the Trust is a membership organisation that seeks to ensure that wild land is protected and enhanced and that wild places are valued by and for everyone. Scotland's wild land is an asset of national and international significance but it is a finite resource. Wild land plays a vital role for carbon storage in trees and peatland, gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in supporting tourism and a wide range of other economic and leisure activities.

The Trust is committed to policy principles which support the current targets of the UK Government and devolved governments for greenhouse gas emissions reduction as these are the primary public

policy tools directed at climate change mitigation. However, the Trust does not support significant developments on wild land or developments that would impact adversely on wild land. The Trust has considered the application against our:

- Wild Land Policy 2010
- Built Development Policy 2013
- Energy and Wild Land Policy 2013 and
- National Planning Framework (3) 2014
- Scottish Planning Policy (2) 2014
- Scottish Natural Heritage Wild Land Areas Map 2014
- Scottish Natural Heritage Wild Land Descriptors 2017
- Scotland's Economic Strategy 2015

1. **National Planning Framework 3 (NPF3):** *“Scotland’s wild land is an asset of national and international significance but it is a finite resource. Wild land plays a vital role for carbon storage in trees and peat land, gives us clean air, water and food and is home to valuable wildlife. Wild land also plays a vital role in supporting tourism and a wide range of other economic and leisure activities.”* It goes on to say: *“We will respect, enhance and make responsible use of our natural and cultural assets.”* It also states *“Scotland’s landscapes are spectacular, contributing to our quality of life, our national identity and the visitor economy. Landscape quality is found across Scotland and all landscapes support place-making. National Scenic Areas and National Parks attract many visitors and reinforce our international image. **We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset (our emphasis).**”* The Trust believes that this proposal as it currently stands does not fully support this statement. In particular the lack of detail of the construction and reinstatement of the access tracks gives us serious concern since they will be highly visible from the road as visitors and residents look into the wild land area and as hillwalkers and mountaineers walk into the area.
2. **Scottish Planning Policy (SPP2):** page 47 section 200 states that :*“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 Trust believes this is a crucial statement against which the proposal must be judged.
3. **Scotland’s Economic Strategy** March 2015 p45 recognises that investment in natural capital is *“fundamental to a healthy and resilient economy”* it also states p11 *“ We will also protect and enhance our natural capital, our brand and reputation as a country of outstanding natural beauty”*. The Trust is of the view that this development, with its highly visible access tracks, will not support this aspiration.
4. **Scottish Natural Heritage (SNH):** SNH in their document ASSESSING THE IMPACTS ON WILD LAND, INTERIM GUIDANCE NOTE, February 2007 (with note below added October 2014)

state that “Development should ideally be sited **so as to avoid adverse impacts upon wild land** (our emphasis).” It goes on to say:

“Where detractors cannot be avoided their impact upon the condition of wild land should be minimised. Detractors include anything that: –

- adds an artificial element to the vegetation pattern (i.e. reduces perceived naturalness);*
- results in new visible structures;*
- makes contemporary land use more obvious;*
- makes access to the area easier; or*
- reduces the remoteness of the area.”*

The Trust is of the view that the proposed Hydro scheme is contrary to SNH’s Guidance as stated above. The proposed access track and powerhouse will result in new visible structures which would make contemporary landuse much more obvious, makes access easier and therefore reduces the remoteness of the area with no sign that the impact is being minimised.

5. **Impact on Wild Land Areas and people:** The proposed Hydro scheme is within Wild Land Area 9 Loch Etive Mountains, as identified by SNH in June 2014, and if approved its development would introduce permanent new tracks, powerhouse and related works into an area where there is currently very little evidence of manmade developments. The development individually and cumulatively with the other hydro schemes proposed would introduce significant visual intrusion across the area and into the NSA and WLA as can be seen in Figure 5.33 of the Environmental Statement (ES). The ES Addendum submission LOGOGEN - FIG 5.7 - ZTV ALLT CEITLEIN exemplifies this point, clearly showing that the WLA will be significantly impacted visually both to the north west and south east of the road. The greatest impact will be on the WLA to the south east. It is important to note that the most significant physical and visual feature of this development would be the access road/track but there is no ZTV related to this aspect of the development. Currently the whole experience of driving along this road when looking to the south east is one of wildness with little presence of modern features.
6. **Visitors, hillwalkers and mountaineers:** Many visitors do not travel a great distance from their cars whether due to physical ability or for other reasons but currently they can see and enjoy the wild landscape. This will be compromised if the application is approved. For hillwalkers and mountaineers the proposed development would have the additional impact of being seen from within the WLA and thus bringing with it discordant and intrusive modern development where none existed before.
7. **Scale, Impact and Balance:** The proposal by itself, but also when combined with the other proposals for small scale hydro schemes in the glen, will make a negligible contribution to the UK and Scottish Governments targets for greenhouse gas emissions reduction. Also it will contribute little to the Scottish Government’s aim of increasing the proportion of electricity

generated from renewable sources, with targets set to generate 100% of Scotland's gross annual electricity consumption from renewable sources by 2020. These minimal gains must be balanced against the landscape and visual cost individually and also cumulatively with the other schemes proposed for the WLA namely Allt Mheuran and Allt Chaoarainn. The development(s) will have a significant negative impact on the Glen Etive Mountains Wild Land Area and the NSA as an overall experience for tourists and hill walkers. The Trust believes that in the balance the gains are far outweighed by the losses.

8. **Construction Management Plan, Planning Statement and EIA Report Vol 1:** These documents say a great deal about the development and the process of construction without really addressing the construction of the tracks and more importantly their reinstatement and screening. The tracks would create the most significant long term visual impact. Given that this is a run of river scheme we would question whether tracks of even 1.8 metres wide are essential after construction is completed in this highly sensitive area. We understand the maintenance needs of the scheme but would suggest that much of the access could be done on foot with necessary tools and equipment stored at the intakes. The need for the tracks must be examined and interrogated; the question of the essential versus the desirable needs to be proven.

If the scheme is approved we ask that conditions be imposed resulting in minimal track size, that it be fully or partly covered and screened by natural vegetation and that full details of how the natural vegetation is to be regenerated be given so as to ensure that as quickly as possible any 'scarring' and visual impact is minimised. It is not enough as is suggested to leave it purely to nature itself to repair the damage. The CMP '2.9 Reinstatement' does not give a great deal of reassurance when it states '*Areas that have been disturbed are to be allowed to re-seed naturally.*' This would take a very considerable amount of time before it blends in with the surrounding vegetation. Also in section 4.1.4 of the CMP there is no mention of the reinstatement of the Borrow Pits.

9. **Transmission Infrastructure: In addition, to the above, consideration must be given to the visual impact of any transmission infrastructure which will be needed to export the electricity to the Grid. If all the schemes are approved this would be a potential total of 7.236mw. Although this will be a separate application it will inevitably involve more visual impact and must be a material consideration.**

For the reasons given above the John Muir Trust believes that this application should be refused.

Yours sincerely

John Low

Policy Officer

John Muir Trust