

## The Glen Falloch Hydro schemes (6) – the gap between spin and reality

### Description



How did the National Park get a planning quality award for this blue hydro pipeline by the A82 in Glen Falloch?

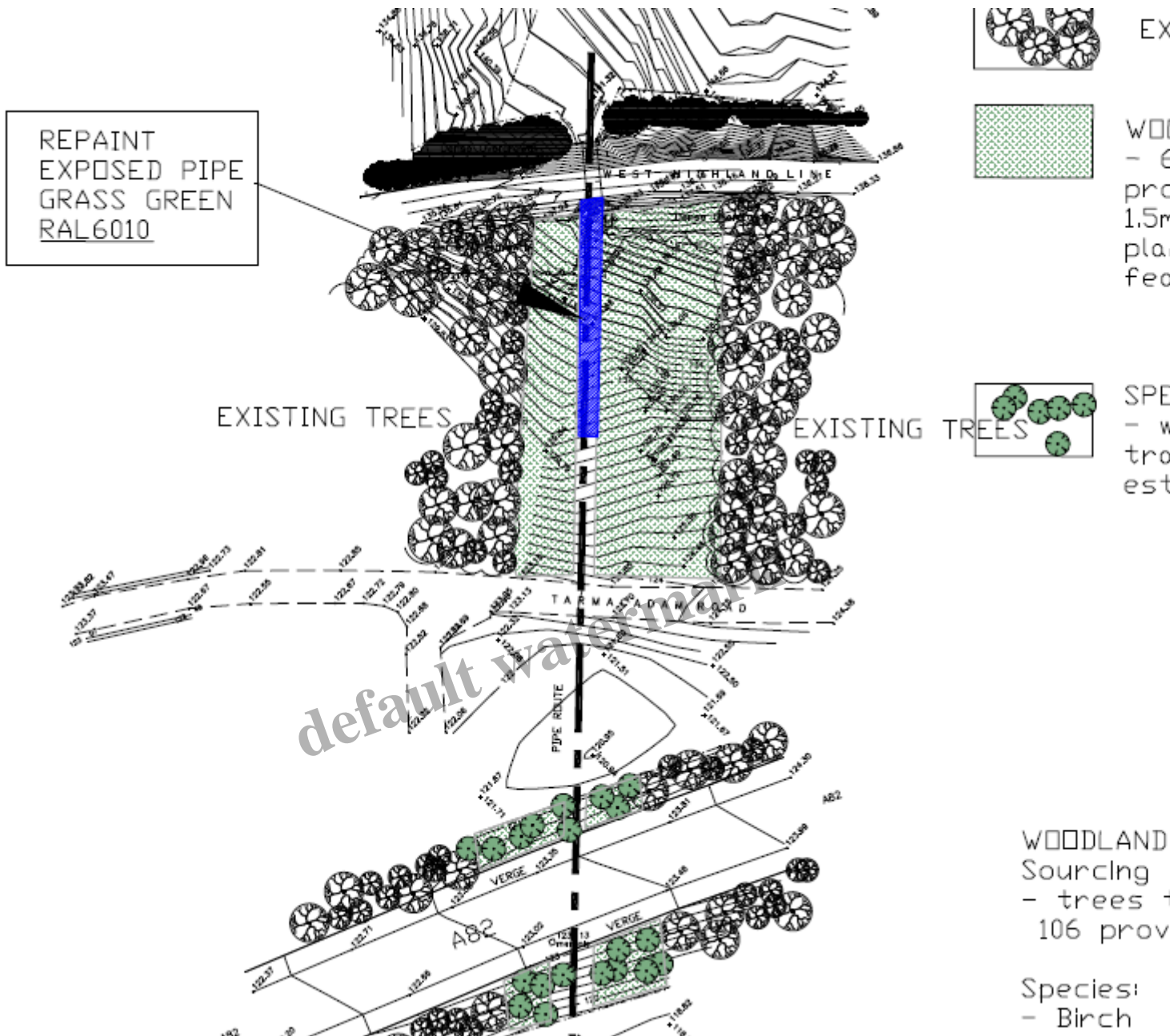
After my last post on the Glen Falloch hydro schemes, which featured the blue penstock by Derrydarroch in the photo above, I asked the Loch Lomond and Trossachs National Park when this penstock was going to be re-painted. The LLTNPA had approved a plan in February that showed native trees were to be planted on both side of this pipe which was going to be painted green ([see here](#)). While the paper trail was not all public, I assumed the LLTNPA had told Glen Falloch Estates that all the penstock had to be re-painted to accord with their award winning guidance on Renewable Energy Developments which stated all pipes should be covered where possible and where not blend in with the landscape. It was a bit of a shock to receive [eir-2016-043-response](#) earlier this week.

*“There has been no request for this pipe to be painted as there will be woodland planting in the vicinity which will screen the pipeline over time”*

The planning section don't even appear to be aware that they approved this landscape plan in February 2016.

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Also, you can clearly see from the photo above that the tree planting, which was supposed to be on both sides of the pipe, is only on one side and will never screen the pipe from the A82 or more importantly from the West Highland Way from where the photo was taken.

Even worse is this response about what the LLTNPA is doing about all the other blue pipes in Glen Falloch:

**“ b) whether the LLTNPA has any plans to ensure that all the other exposed blue penstocks are part of the Glen Falloch schemes are painted an appropriate colour as per the Park's Supplementary Planning Guidance Practice on Renewables.”**

The Park Authority's Supplementary Planning Guidance on Renewable Energy projects takes into account when assessing a range of factors, including the visual impact of a hydro scheme on the landscape. As explained above, the Glen Falloch schemes are not complete and the Park's officers continue to monitor all aspects of these schemes, in consultation with the Park's Woodlands, Ecology and Landscape Advisers.

So, as a National Park, are they or aren't they going to enforce their own guidance? I take the response to mean that the LLTNPA is not going to make any attempt to ensure that all the other blue penstock in Glen Falloch are painted an appropriate colour unless there is public uproar about this. While the penstock contravenes the Park's own Guidance, I have learned from experience any guidance or policy from the Park needs to be taken with a large dose of salt as they continually break their own rules. Whatever the status of their policies the important point is the LLTNPA's commitment to landscape protection is so weak its not even prepared to commit to tackling blue pipe blight. This example should make people very sceptical about the LLTNPA's commitment to put the “special qualities” of the National Park first when considering the Flamingo Land development. The blue pipes of Glen Falloch are worthy of any theme park.

Earlier in the week the LLTNPA planning committee considered its fifth planning performance report to the Scottish Government which contains two pages on hydro schemes. The first explains how hard pressed the Park has been trying to approve a lot of hydro schemes in a short period of time (this doesn't apply to the Falloch Schemes which were approved earlier). Note the claim that:

*“a robust and rigorous approach to the monitoring of the build out phase of the hydro schemes was required in order to ensure the protection of the special qualities of the park”.*

The EIR Response, while listing the Park's monitoring visits to Glen Falloch, refused to release any correspondence with the Glen Falloch Estate so I cannot tell you at present whether this allegedly rigorous process even raised the blight of the bright blue penstock, let alone any other issues. (I will ask for a review and remind the LLTNPA their Planning Charter commits the Park to act transparently).



## DEVELOPMENT MANAGEMENT

### Internal monitoring processes and prioritisation: hydro scheme dev

Toward the close of 2013 and 2014 the National Park Planning Service came under significant pressure to determine a volume of applications for run-of-river-hydro schemes.



The pressure was applied relative to OFGEM 'feed-in-tariff' deadlines, whereby potential hydro operators had to secure planning permission by 31st December in each year, in order to qualify for 'pre-accreditation' to the higher rate of subsidy per unit of electricity generated. This was a 'project focus' in our PPF4. Through this PPF5 reporting period, the service again came under significant pressure as various developers simultaneously sought starts on site. The timing of the build out phase was due to the necessity for developers to have their schemes operational by specific dates (two years from 'pre-accreditation') in order to achieve their desired Feed in Tariffs, which ensured the financial viability of the developments.

Each hydro scheme which receives planning permission has a multitude of environmental conditions to discharge before the developer can start on site (reported in PPF4 pg 14 -15). Throughout the 2015-16 reporting period we had an average of 13 hydro schemes being developed simultaneously on various sites which created additional pressure for the development monitoring officer resource. The service again reacted to these challenges in a responsive and pro-active ways and staff were deployed flexibly, in order to accommodate this significant area of work.

Monitoring of so many complex schemes in a sensitive landscape is a challenge. A robust and rigorous approach to the monitoring of the build-out phase of the hydro schemes was required, in order to ensure the protection of the Special Qualities of the Park.



The intensive and complex nature of this post decision caseload required extra resource to be transferred, to supplement the role of the Planning Monitoring Assistant. This enabled us to create and implement an intensive rolling programme of site visits, to ensure the necessary landscape mitigation and restoration measures are being implemented to our satisfaction onsite.

The National Park covers an area of 720 sq miles, therefore site visits to the more remote areas of the park place a significant burden on our monitoring resource. The forward planning of these site visits has enabled us to co-ordinate our visits with the relevant Ecological Clerk of Works (ECoW) and Landscape Clerk of Works (LCoW) on these sites, thus ensuring that each site receives the required standard of monitoring.

We have also made other changes to our processes to add efficiencies to this resource intensive area of work. The monitoring reports from the ECoW and LCoW are now reviewed within the Development Management Team in the first instance, instead of by our ecological and landscape specialists, and this enables faster and more responsive actions to be taken than previously.



**The second extract (below) explains the LLTNPA received a Scottish Award for Quality in Planning this year for the way it has managed hydro schemes.** The primary reason for the award appears to have been for approving these hydro schemes quickly, before the Feed In Tariff subsidy changed, but it was also "for influencing the implementation of the development on the ground". I wonder if the judges knew about the blue penstock and all the other breaches of the LLTNPA's planning guidance which it has allowed to happen? Note the photo of the stone clad dam wall and the



wooden fencing in the photo below and compare it to the reality ([see here](#)). There is not a single stone clad dam wall in Glen Falloch and lots of galvanised steel. The gap between spin and reality is yawning but what matters is that the LLTNPA is allowing a beautiful landscape to be trashed – rather like the Cairngorms National Park Authority and Natural Retreats at Cairngorm.

## Delivering high quality development on the on the ground

### Run-of-River Hydro

The National Park was a category award winner in this year's Scottish Awards for Quality in Planning, acknowledging our work to support the delivery of run-of-river hydro schemes. The award recognised in particular our work to streamline the planning process, from initial pre-application discussion, through consenting and influencing the implementation of the development on the ground, often in sensitive rural locations.

The rich and diverse landscapes of Loch Lomond & The Trossachs National Park present great potential for run-of-river hydro schemes. Last year's Planning Performance Report described our dedicated work in the consideration of a significant number of planning applications for this type of renewable energy development across the Park, and also reported on subsequent developments on the ground.

The determination of these on-going applications has been guided by the Park's commended Renewable Energy Supplementary Planning Guidance. (See Part 3)



2015 -16 has seen a significant number of planning permissions implemented on site, and currently we have 20 operational run-of-river hydro schemes in the National Park and a further 13 currently under construction. The discharge of conditions requiring final approval of details and working methods prior to work starting on these schemes was a significant workload for the Development Management team in the latter part of 2015 (see our Case Study on the Monitoring of Hydro Development). This demonstrates our work with developers in monitoring the discharge of conditions and construction on site.

On completion of those schemes currently under construction, the total hydro electricity generated from within the Park will be sufficient to power the equivalent of 25,000 homes.



Two of the schemes under construction have completed and the income generated will go directly towards funding other areas of the Park.

In awarding this approach an Award at the 2015 Scottish Awards for Quality in Planning the judging panel said

*'We are impressed with how the planners have managed a caseload of considerable complexity, implementing the successful delivery of 25 approved schemes of up to 12.3mW' and 'the efficient and timely nature of the work was a significant help to the Park when dealing with sensitive landscaped areas'*



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The other information in the EIR though is of even greater concern and I will cover that in my next post

on Glen Falloch

### **Category**

1. Loch Lomond and Trossachs

### **Tags**

1. LLTNPA
2. planning
3. renewables
4. secrecy

### **Date Created**

October 3, 2016

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