Time to take a stand – the proposed new Ben More hydro track

# Description



The black line marks the approximate line of the proposed construction track which the developer wi retained permanently seen from the upper slopes of the walkers path from Benmore farm to the sum Benmore

On 7th July, an application for a new hydro scheme on the slopes of Ben More by Crianlarich, one of the highest and best known Munros, was validated on the Loch Lomond and Trossachs Planning Portal (see here) (or if the link does not work go to <a href="http://www.lochlomond-trossachs.org/planning/planning-applications/find-an-application/">http://www.lochlomond-trossachs Planning</a> Portal (see here) (or if the link does not work go to <a href="http://www.lochlomond-trossachs.org/planning/planning-applications/find-an-application/">http://www.lochlomond-trossachs.org/planning/planning-applications/find-an-application/</a> and search for application Ref 2017/0119/DET or on Benmore farm). On Friday I went to have a look and have now submitted an objection to the application as currently proposed (appended to end of this post). This post is about

why the new Benmore farm proposals are very different to the hydro scheme on Benmore burn which was completed last year and why I have objected. I hope people reading this will be encouraged to consider doing so too (its easy to do, just look up the application and go to the comments tab which allows people to support, object or comment on an application). The application is open for comments until 28th July.

## The Benmore burn hydro scheme

This hydro scheme, which became operational in 2016, is one of the best I have seen in the National Park.



View of the intake from north west shoulder Ben More.

The "track" marks the line of the buried pipeline but generally the vegetation is recovering well. The burn was diverted to build the intake dam and the vegetation on the ground above the diversion



channel has already recovered to the extent you would not know it was there.

The construction track was along the line of the pipeline and was removed completely. The ground is recovering well. The existing hill track – bottom right – was not used for the construction although it runs round the hill not far from the intake.



One thing I really liked about the intake was that instead of the normal concrete retaining wall, the development has embedded boulders in concrete. This creates a far more natural form. You can also see the browner rock below the intake which appears to mark the former "normal" flow levels of the burn. The hydro schemes are having a significant impact on river flows which will affect their ecology.

I don't believe we really know yet what the permanent impacts might be.



When you approach the intake though the most obvious feature is the metal fencing – contrary to Park guidance on use of natural materials (but is it really necessary?) – and the Lomond blue pipe. Its a shame that the left side of the intake has not been finished like the right had side but it does show, I think, what can be done. Well done somebody!

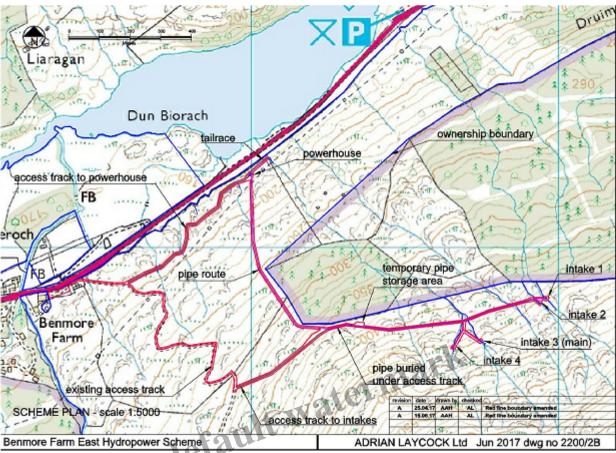


The recovery of the ground above the pipeline and construction track is not as good as it might have been because vehicles have been driven over land which is far too wet to support them.



It was good too to see that the dyke through which the 7m wide construction track had been taken had been narrowed (a contrast to the Falloch and Ledcharrie (see here) tracks) and restored to a high standard. It is possible to construct things of beauty in the hills! I must say I am not sure about the gate, even if its not used by vehicles its likely to encourage – and there were a fair few boot marks – a more direct walking route up the glen over what is very wet ground. So, some reservations, but generally this is a high quality scheme with very little snagging left to do – if only all schemes in the National Park were like this!

## The new proposal



The map shows – more accurately than my amateur attempt in the top photo! – the two sections of new track, the powerhouse, the location of the pipeline and the intakes

What prompted me to visit the location the scheme was the proposal to retain the new access tracks. Having removed the construction tracks to the intake in the Benmore Burn scheme, I wanted to understand why Benmore Farm were proposing to retain the construction tracks to the new intakes. Part of me reckons that this is because since 2013, when the first scheme was approved, the LLTNPA as Planning Authority have moved from a position of assuming tracks should be removed to allowing them to remain everywhere.



Part of the Allt Essan hydro scheme on the north side of Glen Dochart - powerhouse centre

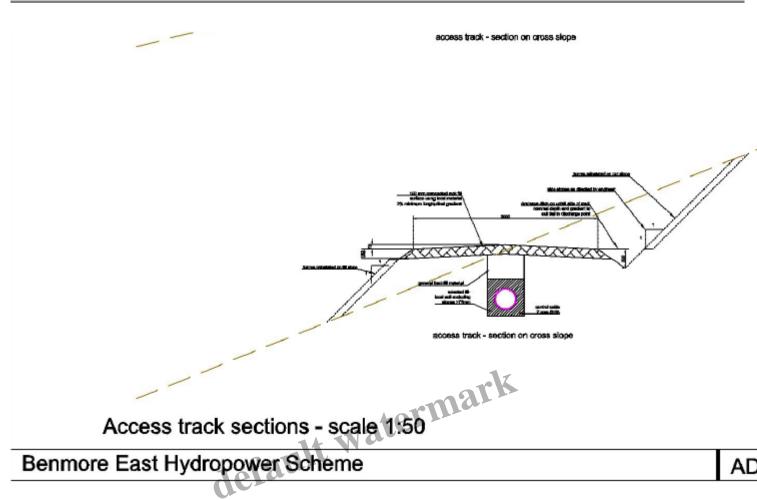
So, if other people are getting away with it, why should Benmore Farm follow best practice? That's why people need to take a stand. The proliferation of hill tracks is destroying the landscape in the National Park – and indeed across Scotland – and those who care about the landscape need to put a stop to this.

The Design Statement gives two reasons for keeping the track, the first to help the shepherd/ess, the second to "provide for walkers who may wish to climb Ben More along Sron nam Forsairean". The second claim is nonsense. Anyone wanting to walk up the Sron would normally do so from the north east side of Ben More, not from Benmore farm, and in any case walkers don't need a 2m wide track (for that is what it is proposed to retain) which stops half way across the hillside. In relation to the first, shepherding is being cut like everything else and shepherds are under pressure to do more in less time. However, the Design Statement states the cost of scheme is approx £530,000 and annual

revenue estimated at c£75k and the scheme to operate for 100 years. In other words it could make over £6m profit in its lifetime, ample to pay for reinstatement of track and to pay the shepherd to walk up to the intakes occasionally



Having visited the site I have become more concerned. The construction track will cut across the hillside from just after the top of the last zigzag on the existing track to just above the top of the plantation. This is steep ground. It means cutting a great bench into the hillside. There are diagrams illustrating this in the application but no indication of how long each steep cross section will be:



The applicants state that they will set out in the Construction Method Statement which would follow approval being given to this scheme how this track will be constructed. I don't think the Park should accept this. The landscape impact of tracks across steeper slopes is all too evident on the other side of Benmore Glen.



Forestry track Creag a Phuirt

There are huge challenges as to how to store the soil and rock excavated to create a track across steep ground and then restore them. I am concerned one reason why the developer may be proposing to retain the track is they know it will be very difficult to restore such ground.

This is not just a landscape issue. The top section of new track and intakes are within the Ben More Site of Special Scientific Interest and all works affecting the soils and vegetation are what are known as operations requiring consent – for complete list of Ben More <u>SSSI ORCS site190-doc28</u>. That is an additional reason to be concerned about the upper access track.



A very rough indication of location of track and intakes. The four intakes are situated on burns which the two plantations (the central burn is not part of the scheme).

While four intakes are proposed, and the plan states they will be small, there are no photomontages in the landscape assessment of how they may look like in the landscape. This seems to me to be a failure. The landscape assessment says the intakes will not be seen from the summit of Ben More, but that is because its just over the brow of the steep slope, they are likely to be visible for much of the way up both the north east and north west shoulders of Ben More. The current plan is for concrete intakes – no mention of incorporating stone as was done on Ben More burn. Another step backwards.

# Why its important to comment on this scheme

I started to look at hydro scheme planning applications after most of them had been approved and what is striking is that I have not yet come across a single objection to an application – not even the

heart of Glen Affric! Ordinary people have just assumed hydro is good while our public agencies, including the National Park Authorities, are under pressure from the Scottish Government to do nothing which gets in the way of the hydro gold rush (most of the financial benefits of which end up in the City of London and nowhere near the people struggling to make ends meet in the Highlands). If no-one objects, our planning authorities, who are under great pressures, simply approve what is put in front of them. We are now reaping the consequences of poorly conceived and poorly executed hydro schemes across Scotland.

Its time therefore to make a stand and what better place than in a National Park which is supposed to have special regard to our landscape and wildlife. I am not against hydro schemes but this must not be at the expense of the landscape and at the very least, in this scheme, the construction track should be fully restored but I think the Park as Planning Authority should be seeking more information about how the track could be constructed and then restored on this ground. A copy of my objection is pasted below.

NB My objection should appear on the Park's website BUT a previous comment on this scheme, dated 4th July (also appended), which pointed out that there was no mention on that date of this proposal affecting a SSSI, has not been published, although that omission has been rectified. Instead I was told: "Please be assured however that I am aware of the constraints on the site and all relevant consultees were consulted when the application was validated." I guess if the LLTNPA had published my comment, someone might have used their failure to list the "constraints" affecting the site as a reason to invalidate the application, or maybe the just don't like it when parkswatch picks up on mistakes?

Commenter Type:	Member of Public
Stance:	Customer objects to the Planning Application
Reasons for comment:	

#### Comments:

Unlike the recently completed hydro scheme on Benmore Farm where the construction track was removed, in this case the applicant wishes to retain it which would have an adverse impact on the landscape of Glen Dochart. The justification for keeping the track is it would help the shepherd and provide for walkers who may wish to climb Ben More along Sron nam Forsaireana – actually walkers wanting to walk up the Sron do this from the north east and with £75k a year income the farm has plenty of money to employ the shepherd/ess to be a little longer on the hill. There is no proper assessment of retaining this track – eg no photomontage – which would be highly visible from slopes below Ben More summit. It is important therefore that the LLTNPA adheres to its policy guidance on renewables and insists if this hydro goes ahead the track is restored.

There are other issues with the scheme though: there are views from the summit down the north slopes of Ben More to the intakes (and to proposed track) and, while relatively small, they may be visible from above. Impact should be properly evaluated and could be reduced if intakes clad in natural stone (instead of plain concrete as proposed). In order not to impact on the landscape these schemes need to be as near to proper run of river schemes, with small intakes, as possible. In addition, the line of the construction track is across what is a steep hillside – as depicted in steepest cross section. For a construction track to be created here will require major engineering which is likely to be very challenging to restore (both to restore the materials which have been removed and then replace them). The Developer is suggesting this should be dealt with by Construction Method Statement post planning permission, I believe the Park needs to be confident the land can be fully restored before granting any consent.

Comments were submitted at 11:52 PM on 04 Jul 2017 from Mr Nick Kempe.

#### **Application Summary**

Address: Benmore Farm Crianlarich Stirling FK20 8QS

**Proposal:** Construction of a run of river hydropower scheme

Case Officer: Julie Gray

**Comments Details** 

Commenter Type: Member of Public

Stance:Customer made comments neither objecting to or supporting the<br/>Planning Application

**Reasons for comment:** 

**Comments:** 

There are no constraints listed against this application at present although the upper pipe and track appear to be within the Ben More SSSI. Could you please confirm whether this is case or not? Among Operations Requiring Consent for the SSSI are alterations of watercourses and construction of new tracks and drainage both of which are included in these proposals

## Category

1. Loch Lomond and Trossachs

## Tags

- 1. hill tracks
- 2. landscape
- 3. LLTNPA
- 4. planning
- 5. renewables

## **Date Created**

July 17, 2017 **Author** nickkempe

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