

12<sup>th</sup> November 2018



John Low  
Policy Officer  
Tower House  
Station Road  
Pitlochry  
PH16 5AN  
**Tel: 01796 470080**  
[john.low@johnmuirtrust.org](mailto:john.low@johnmuirtrust.org)

The Highland Council

18/04648/FUL | Proposal to construct and operate a run-of-river hydro scheme (Scheme 5 - Allt Leachdach and Allt Beinn Chlianaig) | Leanachan Forest Torlundy Fort William

18/04647/FUL | Proposal to construct and operate a run-of-river Hydro scheme (Scheme 3 - Allt Coire an Eoin) | Land 685M SE Of Nevis Range Torlundy Fort William

18/04646/FUL | Proposal to construct and operate a run-of-river Hydro scheme on the Allt Daim (Scheme 2 - Allt Daim) | Land 2460M SE Of Aonach Mor House 9 Forestry Houses Torlundy Fort William PH33 6SW

Sent by email : [epc.planning@highland.gov.uk](mailto:epc.planning@highland.gov.uk)

The John Muir Trust wishes to comment on the proposal to construct and operate the above named a run-of-river hydro schemes by SIMEC GHR Ltd. Our comments cover all three 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

Having visited the area of the proposed run of river hydro schemes in October with a representative of SIMEC Green Highland Renewables Ltd (GHR) I believe that these schemes are all well researched, carefully planned and proportionate to the landscape. It is our opinion that if the proposals for reinstatement and continued access to the intakes are adhered to the developments will not be significantly detrimental to the area. However our caveat is that fine words are easy to say or write it is the actual practice that must be questioned.

The area has historically been subjected to significant industrial development going back to the 1920s with the construction of the existing interconnected large scale hydro schemes and very extensive network of tunnels which supply electricity to the nearby Aluminium Smelter. There is significant evidence in the area of these developments such as concrete structures, walkways and intakes, sections of the original tracked tramway and its related bridges, burns which have previously been diverted to feed the hydro scheme. In addition there is a very extensive network of wide forest tracks. The forestry is predominately commercial plantation which is also a contemporary landuse. All this adds up to an already modified and impacted landscape.

The proposals from GHR are, on the whole, sympathetic to the landscape and environment of the area and in some cases will mitigate previous damage. It will also utilise some aspects of the already approved but not yet constructed mountain bike track and bridges as a means to screen some of its development such as taking the penstock over a burn by fitting it underneath the bridge installed for the mountain bikers.

Access to the intakes will be by a grassed over track which will be suitable for a quad bike but this means of transport will only be used as and when heavier equipment is needed to carry out maintenance work. In normal circumstances staff visiting the intakes will go on foot. It is this aspect which gives us some concern. The idea is a good and laudable one but it is the practice which worries the Trust. In reality will a workman walk in or will they actually decide 'I'll just take the Quad'? How will this be monitored and implemented effectively? This is a development which may be in operation for 60/70/80/90/100 years so what guarantees can be given?

Guarantees also need to be given that once work is begun the specification will not change significantly and that what is promised is actually what is delivered and continues to be delivered over the lifetime of the schemes. GHR completed hydro schemes in Glen Affric and the finished tracks did not reflect the original proposal and we are now left with scars on the hillsides. Fine words are not enough, absolute guarantees are needed.

Yours sincerely

John Low

Policy Officer

John Muir Trust