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Sent: 23 May 2018 09:37:02 +0000
To: planningemail - Loch Lomond
Subject: Objection to Planning Application 2017/0119/DET: Benmore Farm Hydropower Scheme

I understand from a recent telephone discussion with Sue Laverge that further information is still awaited from the applicant but any comments on the proposals should be made now. My 26 September 2017 email to Julie Gray commented on the revised EIA screening opinion and some aspects of the scheme but as this does not appear on the planning application list of documents these points are repeated below along with comments on the additional information submitted by the applicant on 19 December.

The revised EIA screening opinion provides a more accurate description of what is proposed but even after taking into account the 2017 amendments to the EIA Regulations I fail to understand why the scheme is not considered to be EIA development when that approved in 2014, only a few hundred metres to the west, was.

The approved scheme uses an existing track to the single intake located at about 300 metres AOD whereas the proposed scheme includes a new 1 kilometre track across the steep northern slope of Ben More to four intakes at about 450 metres AOD. Given that Benmore Farm and the A85 here is at about 160 metres AOD, the new scheme therefore goes twice as far up Ben More than the approved scheme.

Although the proposed scheme access track and intakes will be partially screened from the A85 directly below by an existing forestry plantation, these will be clearly visible in views along Glen Dochart from Crianlarich, as confirmed in the revised ZTV plan dated 3 October. Any screening provided by the trees will of course disappear after these are felled and on 7 February Forest Enterprise Scotland commenced a review of the Land Management Plan which is likely to include replacement of the Sitka spruce directly below the hydropower scheme access track and intakes with slow growing broadleaved native woodland opening up views of the northern slopes of Ben More.

The statement in the EIA screening opinion that '...due to the major construction works already having been undertaken for the above noted schemes, the chance for significant cumulative environmental impact is low' does not make sense. Surely, there must be a limit to the number of hydropower schemes that Glen Dochart can accommodate and, in this regard, my old 1:25,000 pathfinder OS map published in 1986 shows the northern slopes of Ben More without any tracks.

The EIA screening opinion goes on to comments that the proposed development is 'on the periphery of a wild land area, the core and boundary wildland area being further uphill to the south' and that 'it is not considered that there will be a significant impact on wildness at this location'. This assessment appears to relate to the Ben More-Ben Ledi WLA and does not take into account impacts on the Beadalbane-Schiehallion WLA on the other

side of Glen Dochart from where the new track and four intakes will be visible, particularly so following the felling of the downslope woodland.

Although no explanatory text is provided to accompany the 'Coignafearn track for info photos' that were added to the planning application documents on 19 December, it is assumed that these were submitted by the applicant along with the revised sections drawing to show what the proposed track to the intakes would look like. The slope that would be traversed by the proposed track to the intakes is of course steeper than that shown on the photographs and indicated on the sections and confirms that it, along with the four intakes, will create a permanent scar across the northern slope of Ben More, one Scotland's iconic mountains.

Please let me know when the further information has been submitted by the applicant as it is likely that I will have some more comments to make on this.

Bill Stephens