



Campaigning for the Conservation of Wild Land in Scotland

Publisher of Scottish Wild Land News

Beryl Leatherland
Convenor

Ms Rebecca Hindson
Planning and Building Standards
The Highland Council
Council Offices
84 High Street
Dingwall IV15 9QN

2nd November 2018

Dear Ms Hindson

Planning proposal, reference 18/02458/FUL: installation of hydro-electric scheme [up to 2.0 MW] including dam and intakes, buried pipelines, powerhouse, tailrace, formation of access tracks, borrow pits, and buried 33kV cable grid connection [EIA development] land at Loch a'Bhraoin Braemore Loch Broom.

I am writing on behalf of the members of the Scottish Wild Land Group to **OBJECT** to this development proposal on the following grounds:

Landscape and visual impact: These are important concerns for our members. The assessment carried out on the developer's behalf seriously underestimates the adverse impacts on the visual amenity that will result from construction and the time required for vegetation to recover. The development site will disturb a large area in a sensitive location. The site is adjacent to the Fannichs, Beinn Dearg and Glencalvie Special Landscape Area and the Fisherfield – Letterewe – Fannich Wild Land Area [WLA]. We are particularly concerned about the final appearance of the dam, for which there seems to be no suitable amelioration proposed. In addition it is proposed that final tracks should be 3 metres wide; the SNH guidance on constructing tracks in such locations recommends a width no greater than 2.5 metres, in addition a central vegetated strip helps to reduce the impact of tracks in the landscape. We find the statement "no noticeable effect is anticipated once construction works are complete" to be highly optimistic. Dam and track construction, vegetation removal and then revegetation, changes in forestry and woodland, represent extensive alterations that will in our opinion impact on key qualities and wild land character of the WLA and will compromise its integrity. The landscape impacts will be largely dependent on the quality of construction carried out by the chosen contractor and the extent to which conditions set are closely followed.

Recreation and access: the area is used for several recreational pursuits, including hillwalking in the Fannichs, year round. There will be a reduction in the quality and amenity of the recreational experience in what is a very popular area which brings in many visitors who contribute to the local economy in various ways, due to this industrialisation of the location. There should be a Recreation Access Management Plan drawn up which describes how unobstructed access is to be maintained at



all stages of construction and then during operation of the commissioned facility, in order to conform with the Scottish Outdoor Access Code and the Land Reform [Scotland] Act 2003. There are currently good public access paths in the area, and we notice that it is proposed to partially re-route one of them.

Aspects of construction: There are GWDTE habitats in the area and we note that suitable mitigation and protection have been suggested; but again this depends on the quality of the work carried out. This is equally the case in managing the limitation of peat damage. A major concern is the potential for silting of watercourses – and there is some fishing in the area. It is very easy to cause damaging siltation of watercourses during construction if appropriate techniques are not deployed and properly maintained.

Wildlife and vegetation: we note that some phased linear construction is envisaged and during this every opportunity should be taken to set aside turves of vegetation that can be maintained in good condition and then replaced within a short time scale if vegetation is to be reinstated satisfactorily. There is considerable Otter, Water Vole and Pine Martin presence, indicated by signs of activity in various parts of the site, and breeding habitat. These have Nature Conservation Significance as European Protected Species [Otter] and all are UK/Scottish BAP Listed. The potential for disturbance due to noise, human presence and machinery movement and operation is considerable. Some mitigation has been suggested but we anticipate that the level of disturbance will be significant and the viability of these currently appreciable populations will be adversely impacted.

The members of the Scottish Wild Land Group recognise the value of certain renewable energy facilities in reducing greenhouse gas emissions and ameliorating climate change. The latter is the most serious problem facing the planet and it is essential that we deploy what resources and strategies we can in preventing global temperatures from rising. However, we consider that there is an imbalance in the case of this particular development proposal in that the potential for landscape and natural heritage impact is excessive compared with a very minor gain in energy generation capacity, hence our decision to make an objection.

Yours sincerely

Beryl Leatherland

