# CAIRNGORMS NATIONAL PARK AUTHORITY

**Title:** **PROPOSED SECTION 36 APPLICATION FOR A HYDRO - ELECTRIC GENERATING STATION AT FALLS OF UNICH, NEAR LOCH LEE, ANGUS.**

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## Purpose

Innogy Hydro have formally requested a scoping opinion for their proposed hydro-electric generating station at Falls of Unich, in accordance with regulation 7 of the Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2000.

This consultation is from the Scottish Executive, who are requesting our views on the information which ought to be provided within the environmental statement. This is not a consultation on the proposal itself, but a chance to tell the developer what information we will need with the planning application and what our concerns will be.

The map on the following page shows the extent of the scheme proposal. The western tip of Loch Lee is shown at the right; this is accessed via Invermark at the head of Glen Esk. The green routes show where there are existing land-rover tracks; the red routes indicate new access roads/tracks. The four red squares, P1-P4, show possible locations for the power-house, sitting at the head of the flood plain. (the Falls of Unich are just west of P1). The blue dashed line denotes the 3 routes of the pipes linking the dam with the power-house; 2 use the rocky glen through which the Waters of Unich flow, one follows the access track loop round Hunt Hill to the NW. To scale the drawing, the horizontal grid lines are 2km apart.

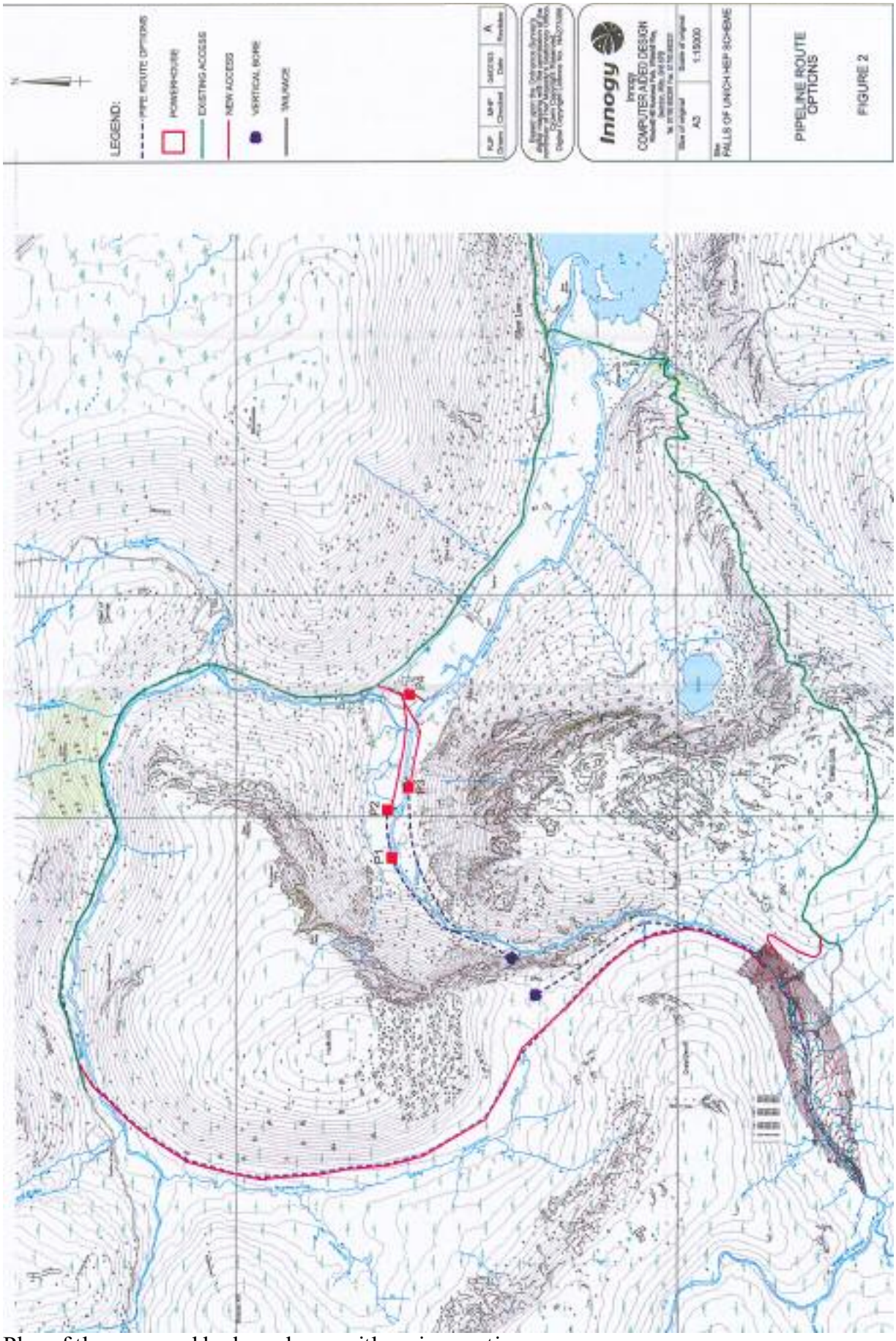
The following Annex 1 is our recommendations for the EA assessment, with a page of photos at the end for information.

## Recommendations

The Board supports the consultation response as set out in Annex 1.

## Executive Summary

The potential impacts of this proposed development cause considerable concern, but until the planning application and environmental assessment are received we are not required to comment further. We have had some dialogue with SNH, who have commented at length on the many environmental issues that the EA should address (and SNH would of course be a statutory consultee to ourselves should we call-in the future planning application). The consultation report in Annex 1 covers the general issues which we feel should be addressed in the EA. Other bodies who have been consulted by the Executive include: Angus Council, SEPA, Fisheries Committee, Scottish Water, Historic Scotland, SWT, RSPB and many others.




Plan of the proposed hydro-scheme with various options.

# ANNEX 1

## DRAFT RESPONSE TO REQUEST FOR SCOPING OPINION THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000

## PROPOSED SECTION 36 APPLICATION FOR A HYDRO -ELECTRIC GENERATING STATION AT FALLS OF UNICH, NR LOCH LEE, ANGUS

The proposal is for a 6MW hydro-electric scheme on the Water of Unich, upstream of Loch Lee; it will provide 'clean electricity' to some 3300 homes. This consultation will give the Cairngorm National Park Authority's advice on how the scoping report should be developed in order to produce an adequate Environmental Statement (ES). This advice is based on the content of the Innogy scoping study environmental report. The comments made here will not prejudice any comments that may be made at the stage of a detailed Environmental Statement and Planning Application.

Cairngorms National Park
The proposed hydro-scheme is within the Cairngorms National Park (CNP). Due regard is therefore required for the National Planning Policy Guidelines (NPPG) 14 (particularly paras 24, 25 and 33) and NPPG6 Renewable Energy Developments (para 22, 37, 38). Renewable energy projects should only be permitted where it can be demonstrated that the objectives and aims of the CNP will not be compromised, or any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social and economic benefits of national importance. In an ES there must be full justification given as to why a site within the CNP is necessary, and consideration given to (possibly) more suitable sites outwith the Park. If several schemes are to be optioned, it would be helpful if they were detailed on separate plans for clarity. Mock-up photos or computer-generated models of the completed schemes would also be useful in assessing the visual and landscape impacts.

The input of the CNPA will differ somewhat from other consultations in that everything is assessed against national and local guidance & policy, but equally importantly we assess proposals for their significance to the four Aims of the Cairngorms National Park, which are:

(a) to conserve and enhance the natural and cultural heritage of the area;
(b) to promote sustainable use of the natural resources of the area;
(c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
(d) to promote sustainable economic and social development of the area's communities.

Where there is a conflict between the aims, the first aim carries greater weight over the others.

The CNPA has the planning responsibility to produce a Local Plan (which will supercede the Angus Local Plan within the Park boundary when adopted) and to call-in planning applications which are of significance to the objectives and aims of the CNP. The application for this Hydro-Electric proposal would almost certainly fall into that category, in which case the CNPA would become the Planning Authority in determining the application.

The Scottish Executive have requested that this consultation be structured under six headings:

1) Description of the development.
2) Description of the Environmental Impacts.
3) Analysis of Environmental Impact Including Methodology.
4) Description of Methods to Offset Adverse Environmental Effects.
5) Non-Technical Summary.
6) Difficulties in Compiling the Additional Information.

**1) Description of the Development:**

All elements of the proposed development should be carefully detailed, with diagrams where possible.

**Access:** If the existing track is to be upgraded (to take construction traffic) then we need to know the extent of this and the proposed materials. Likewise, for the new tracks we need to know the method of construction and materials proposed. New tracks will also need drainage provision, which will have significant environmental impacts (see section 2).

**Dam & Reservoir:** The implications for constructing a 180m (approx) wide dam in such a remote location are immense. A detailed methodology is required for the construction process as well as a list of materials and a comprehensive landscape impact analysis.

**Pipe routes:** On completion, the pipes should not be visible at any point; a detailed methodology is required for the installation, whichever route option is preferred.

**Powerhouse:** The powerhouse, with a footprint of 10x14m, is going to be extremely exposed sitting at the head of the Glen Lee floodplain, where the only existing development is a derelict corrugated-iron shack. Materials should be local stone walling and slate roof (or a turf roof), the building should be designed & built to sustainable standards, and its visual impact should be reduced as much as possible.

**Cable links:** the cable connection to the national grid should be underground for its entire route; details are required for this installation.

**2) Description of the Environmental Impacts:**

We would expect a comprehensive description and assessment of all the environmental impacts resulting from the proposed development; the following issues were not addressed by the initial environment report:

Under 2.1

Downstream issues appear to have been omitted (for example, the impact of changed flow on the ecology of the Esk below the sites). As well as considering the impacts of the hydrology of the wider catchment, both up and downstream, the ES should consider the impacts on the ecology up and downstream. The ES should state any designations that exist in the wider catchment, with an analysis of how this development would impact on them.

Under 6.1.3

The upland breeding bird survey should be undertaken at an appropriate time of year and should cover the entire site. The survey undertaken this year appears to have been undertaken too late (although no date was given for the survey) to provide meaningful results.

Under 6.5

We require a much fuller landscape assessment. If possible, an idea of the impact on visitor experience should be considered (perhaps by looking at impacts on other areas where a wilderness experience has been replaced by the construction of a dam etc). The socio-economic impacts of changes to visitor's number should be included.

Plus
Further information required on:

- the impacts on field sports, especially stalking and grouse shooting.
- the impacts on transportation and access
- the impacts on non-scheduled archaeological and other historical interests
- the impacts of the proposed developments; e.g. drainage to new access tracks.

**3) Analysis of Environmental Impact Including Methodology:**
All the issues covered in Section 2 need to be addressed as a minimum under this section. The degree of significance of impact must be pre-agreed to an established set of guidelines, possibly thru SNH and ourselves.

**4) Description of Methods to Offset Adverse Environmental Effects:**
This needs to cover nature conservation concerns as well as landscape/visual impact mitigation measures, for all sections of the proposed development.

**5) Non-Technical Summary:**
This should be written in simple non-technical terms to describe the various options for the proposed development, and the mitigation measures against the adverse environmental impacts which would result.

**6) Difficulties in Compiling the Additional Information:**
SNH can advise on the types of surveys that are required, the organisations/ companies who are qualified to carry-out such work, and the bodies who can advise on other complex issues (such as assessing landscape and visual impact assessment, and access issues).

## Conclusions:

Glen Lee is of particular significance to the CNP because of the variety of landscape elements that combine to form scenery of exceptionally high quality. The drive up Glen Esk through rolling farmland, moorland and natural woodland turns westwards into Glen Lee and the foot of the loch. At the head of Loch Lee is the flood plain, at whose head is the confluence of the Waters of Unich and Lee, the former raging down a rocky gorge with two very impressive waterfalls, the latter more gently through a highland valley; both of which culminate in upland moors. This variety of landscape form also relates into a variety of valuable habitat for flora and fauna; the combination of both equates into the justification for inclusion within the CNP, an unspoiled landscape of exceptional value and interest. All of the above will be affected by this hydro-electric proposal to some degree, as will the economic and recreational users of the area; the valleys are very popular with walkers and the area is an active sporting estate, with some forestry.
The environmental statement will have to satisfy the CNPA that the proposal is fully justified for this site and will not have a significant impact on the aims and objectives of the Park.

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The existing track adjacent to the flood plain▲

Site for power-house positions, Falls of Unich in mid-centre▲

Site of the proposed dam ▲