



# The Grampian Club

Founded 1927

Contact: David Gibson, [REDACTED]  
email: [REDACTED]  
Call: [REDACTED]  
Club website: [www.grampianclub.org.uk](http://www.grampianclub.org.uk)

**Objection by The Grampian Club to Planning Application 18/02740/FUL for the “Construction of a run-of-river hydropower scheme, abstract water from the Allt Fhaolain burn and pipe to a turbine, estimated turbine will be sized up to 586kW generating an average of 1.64GWhr of energy each year”**

## 1. Purpose

The following statement is the agreed position of the elected representatives of the members of the Grampian Club (the Club), which objects in the strongest terms to application 18/02740/FUL.

The Club’s position is that the installation and operation of the hydropower scheme, should consent be granted, would have a significant and detrimental impact on the public benefit, amenity and resultant income derived from the mountaineers’ hut known as “Inbhirfhaolain” (the Hut) and ultimately result in the continued habitation of the property being unsustainable. The Hut is located at map reference NN 158 507 which is shown on the applicant’s drawings as being just over 100 metres from the power house.

Fundamentally, should the volume and integrity of the water supply to the Hut not be guaranteed, the viability of the Hut and the Club’s ability to raise sufficient income to sustain the property would be in severe doubt, due to the likelihood that mountaineers would no longer wish to use the facility due to the loss of amenity described below. If the Hut becomes unviable, the Club and its members would stand a significant loss in terms of both income and capital and the Hut itself would ultimately be brought into disrepair.

## 2. Introduction and Background

This statement explains the concerns of the Club and the rationale for the objection, including the impact on its members, its finances and the amenity of the simple living accommodation provided by the Hut at modest cost to hundreds of mountaineers from Scotland and beyond seeking to enjoy the peace, quiet and adventure offered by Glen Etive and its surrounding mountains.

The Grampian Club is an unincorporated association founded in 1927 and based in Dundee, with 230 members who are resident in Scotland, England and beyond. It was one of the original founding member clubs of Mountaineering Scotland, the national representative organisation for mountaineers, to which it continues to be affiliated.

The Club acquired the tenancy of the Hut and its environs in 1961 and then purchased the property in 1991 from The Secretary of State for Scotland (the Club assumes now Forestry Commission Scotland (FCS)).

On acquisition, the Hut was a simple but badly run-down roadmen's' bothy and the Club initially invested significantly to improve the living accommodation to a habitable standard. Over the intervening 57 years the Club has made regular and ongoing investments to ensure that the Hut is not only maintained, but improved to meet all applicable regulations and standards, including human waste disposal, health and safety, and fire regulations.

Club members have also expended considerable communal effort to ensure that the surrounding grounds, parking areas and drainage are well maintained and in compliance with relevant notices such as the recent Forestry Commission Scotland action to eradicate *Phytophthora ramorum* in the rhododendron trees on site, and associated protective measures.

Uniquely to mountaineering club huts in Scotland, the water supply is not taken directly from the mains or from the burn, but collected from the burn by hut occupants at a designated collection point. Water containers and a trolley are provided to enable the water collection operations to be executed successfully and safely. This feature of the Hut is one which appeals to many mountaineers who favour a basic approach to enjoying the mountain environment.

### **3. Contribution to the Local Economy**

Whilst the Hut is available to members of the Club for hire it is primarily offered to other clubs and individuals, subject to club affiliation to, or individual membership of, a mountaineering council located in the British Isles. During the last 7 years there have been 120 club bookings and the Hut has provided 4500 bed nights over this period, providing a significant contribution in terms of tourism spend and associated economic and employment benefit to the local economy.

The Hut offers modest but comfortable accommodation for up to 13 people. Bed nights cost £6.00 per person to hire and the income derived is reinvested in the Hut by the Club, whose members also invest a significant amount of their personal time by volunteering to assist with the maintenance of the Hut and its grounds. This 'in kind' cost provided by volunteering effort is difficult to estimate in monetary terms but Club members regularly pay visits to the Hut for the purpose of work parties, with a typical annual average of over 50 person-days expended, again with associated spend in the locality.



#### **4. Objection**

**The Club objects to application 18/02740/FUL on 5 grounds, explained below:**

##### **A. No Prior Notification and Consultation**

Given its tenure of 57 years, the Club is astonished that it has not received any direct approach from the landowner or the applicant the applicant, Dickins Hydro Resources Ltd. A company based in London, in respect of the application. The Club is fortunate in that its officers only became aware of the application following a post on Facebook by a member of the public.

Given the importance of the Hut to the Scottish and wider mountaineering community, as well as the Club, the officers of the Club believe that the lack of consultation means that either that the landowner and applicant have not undertaken sufficient research into the proposed scheme, or that they wish to maintain an air of secrecy about the scheme in the hope that it will not attract the attention of those impacted by the proposed development.

##### **B. The disruption to, and viability of, the Hut's water supply**

According to the applicant, during construction the flow in the river can be expected to be disrupted for periods of time, meaning that occupancy of the Hut will not be possible. Whilst the applicant acknowledges that there is a risk of contamination during construction, once the system is complete and in operation, given the proximity of the scheme outfall discharge point to the Hut water collection point, it is likely that the water will be agitated and unfit for human consumption, with significant consequences for occupancy of the Hut, and its consequent viability. It is notable that the applicant has either considered it unnecessary, or has simply not bothered, to establish the water supply source for the Hut despite the fact that it is only 100m from the scheme. This is confirmed by drawing D-2436 which simply shows a question mark against the property and the content of the application form which states that no new or altered water supply arrangements will be required.

##### **C. The noise from the power house turbines will be constant**

It should be obvious to the applicant and planning authority that the proposed location is a secluded glen where any noise is noticeable, especially a constant mechanical noise, and even more so in the evenings, a time of day when Hut occupancy is at its peak. Any noise from the turbines will detract very considerably from the amenity and enjoyment of visitors to the Hut, leading to a decline in occupancy and income as the deterioration in the Hut's established reputation and amenity become widely known amongst mountaineers.

It is astonishing to the Club that the applicant has made no attempt to quantify the likely noise impact to Hut users; paragraph 11.2 of the EIA Report Volume 1 simply advises *"The*

*impact of noise during operation of the Development will be minimised by the enclosure of the generator within the power house. This chapter therefore only addresses construction*

*noise.*" Equally astonishing is that nowhere does the applicant describe the materials proposed for the construction of the power house, let alone their acoustic attenuating properties, nor does it give any indication of any intent to use acoustic ventilation louvres to reduce the escape of noise.

#### **D. The visual impact of the power house, associated facilities and the hard standing**

The power house will have the appearance of an industrial facility, one in plain view from the Hut and the Glen Etive road, and as such, totally unsuited to its surroundings. It will be just over 100m away from the Hut, and in addition to its obvious presence, interrupt hut occupants' view of Ben Starav, and in overall terms, result in a significant further deterioration from the amenity currently provided.

We note that the applicant considers this in paragraph 5.7.8.3 of the EIA Report Volume 1 which states: *'From Inbhirfhaolain, located in close proximity to the site, it is apparent that a stand of surrounding mature conifer trees would screen the Development from the view although it possible that filtered glimpses of the power house could be experienced. If so, the magnitude of effect is assessed as negligible, resulting in a moderate-minor (not significant) effect.'*

The Club considers that a) this assessment is unrealistic and the visual impact will be significant and b) that it further demonstrates a lack of diligence on the part of the applicant. This is evident because the applicant has not bothered to check the existence (or otherwise) of the trees as made clear by the use of the conditional term 'If so'. In any case, an important consideration concerning tree cover is of course its lack of permanence, as trees are subject to harvesting, disease, wind attrition and the ageing process.

It is also of concern that the Zone of Theoretical Visibility as described in Section 5.7.3 of the EIA Report Volume 1, and as illustrated in Fig 5.6 of the submission, must be open to doubt since the analysis assumes the height of the power house to be 5.0m whereas it is specified as being 6.5m, and that the height of the main intake is in excess of the 1.0m assumed in the study. This would suggest that the Zones of Visibility will be considerably greater than that shown in Fig 5.6.

This assessment by the Club is reinforced by examination of the description in the planning statement relating to the appearance of the power house which is that the *'finish would be consistent with a small bothy, with some larch cladding to break up the scale of the building and assist with it blending in to the surroundings.'* As members of the Club have a close affinity with 'bothies' we find this statement to be totalling misleading to the point of being disingenuous, and it is presumably designed to be so by the applicant. Putting it succinctly: there is no way this building will blend into the surroundings. The building would have a tin roof which can be expected to be the type of metal cladding used on the roofs and walls of industrial buildings.

Surprisingly, the submissions omit to describe the material used in constructing the walls of the power house, other than that they will be partially clad in larch cladding, and that un-clad elevations will be finished in white painted render, and the Club considers that there is insufficient information here to enable an objective decision on this aspect of the application to be made. The ridge line of the power house is an intrusive 6.5m above ground level and it will be located just off the Glen Etive road and therefore in plain view of all road users, especially as hard standings will be formed around the building and to provide access from the Glen Etive road.

#### **E. Right of access to water and obligations of the landowner**

The Club believes that The Secretary of State for Scotland (FCS) owns the land upon which the scheme is planned to be built and must therefore be party to the scheme. The Secretary of State for Scotland is referred to in the Title Deeds drawn up at the time the Club purchased the Hut as the 'Superior' or landowner. The deeds state that the Club has 'a servitude right of access to the water supply system the location of which is not known, together with access thereto for the purposes of maintenance repair and renewal'. This provides the Club with a right of access beyond the boundaries of its land to the Hut water supply, which can only be the burn, as there is no other source and never has been. We recognise that the landowner does not have an active obligation to do anything as regards the water supply, but to actively interfere with the supply would clearly be contrary to the terms of the sale agreement.

#### **5. Contact for correspondence:**

David Gibson,

