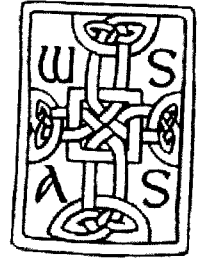


Our ref: 7/3/15/Cons 37982  
Your ref: 18/01879/PP  
WoSASdoc: 18\_01879.doc  
Date: 9 October 2018  
Contact: Martin O'Hare  
Direct dial: 0141 287 8333

WEST of SCOTLAND  
ARCHAEOLOGY  
SERVICE



Development & Infrastructure Services  
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Dear Sir or Madam,

**Re: Planning Application 18/01879/PP - Construction of a hydropower scheme with three intakes (an earth embankment dam with storage reservoir and two overflow weirs), a buried penstock, powerhouse and incorporating a private water supply, Glenure Hydro Scheme, Glenure Fasnacloich, Appin**

I refer to the above application for planning consent, which appeared on a recent weekly list of applications registered with the Council. I have downloaded details of the proposal from the National Park's online planning system, and having compared these against information contained in the Historic Environment Record (HER) and with available cartographic sources, I would like to make the following comments.

I can confirm that no archaeological sites are recorded in the Historic Environment Record from the immediate vicinity of the various elements of the proposed hydro scheme. However, it is possible that this may reflect the fact that the ground has never been subject to a systematic programme of archaeological survey, rather than indicating a genuine absence of evidence for earlier phases of occupation. It is certainly the case that sites representing various phases of activity have been recorded from elsewhere in Glen Creran, and it is possible that similar material could be present in the ground that would be affected by construction of the hydro scheme. There is nothing in the various documents that have been supplied in support of the current application to suggest that the developer has considered this aspect, or has taken measures to assess the impact of his proposal on the historic environment.

We would generally expect an application for a hydro scheme of this type to be accompanied by the results of a walkover survey, conducted by an appropriately-qualified professional archaeological contractor. The purpose of this survey would be to assess the potential for previously-unrecorded features to be affected by construction activity, to allow measures to be put in place to mitigate these impacts. However, this does not appear to have been carried out in advance of this application being submitted. In the absence of a document of this type, I would advise that the following condition should be attached to any consent that the Council may be minded to grant. The wording of this is based on our experience elsewhere, and reflects the principles outlined in PAN 2/2011:

*"No development shall take place within the development site as outlined in red on the approved plan until the developer has secured the implementation of a programme of archaeological works in accordance with a written scheme of investigation which has been submitted by the applicant, agreed by the West of Scotland Archaeology Service, and approved by the Planning Authority. Thereafter the developer shall ensure that the programme of archaeological works is fully implemented and that all recording and recovery of archaeological resources within the development site is undertaken to the satisfaction of the Planning Authority in agreement with the West of Scotland Archaeology Service".*

This condition would be implemented by means of the developer appointing a professional archaeological contractor to prepare the written scheme of investigation (WSI) required by the condition.

The Archaeology Service of the Councils of Argyll & Bute, East Ayrshire, East Renfrewshire, Glasgow City, North Ayrshire, Renfrewshire, South Ayrshire, South Lanarkshire, West Dunbartonshire and West Lothian, and of the Loch Lomond & the Trossachs National Park.

This is basically a project design document, which should set out the various phases of work that may be required to suitably address the impact of the proposal on archaeological material.

As the first stage of this process, the archaeological contractor would be required to undertake an initial walk over survey. This survey should cover the route of the proposed new pipeline, with a suitable wayleave on either side, and should include areas that would be affected by construction of the proposed intake structures, power house and tailrace, as well as any ground that would be affected by construction of new sections of access track or that would be flooded as a result of the formation of the dam that is proposed at intake 3. The aim of this survey would be to identify any additional upstanding but as-yet unrecorded features that may be present in these areas. The results of this walkover would then be used to refine any subsequent mitigation measures that may be necessary in relation to the proposal.

The basic aim of any subsequent mitigation programme would be to identify and avoid any upstanding archaeological features located in areas that would be affected by construction of the proposed hydro scheme, in line with both National and Local Plan policies relating to the treatment of archaeology in the planning process. If, following the results of the initial walkover survey, it were not possible to amend the position of elements of the hydro scheme to avoid archaeological features, it would then be necessary for the archaeological contractor to design and undertake a programme of monitoring, excavation, post excavation work and publication, to ensure that any sites affected by the proposal were preserved by record.

Yours faithfully

West of Scotland Archaeology Service