

FEARNA STORAGE

Fearna Pumped Storage Hydro Scheme EIA Report

Appendix 4.3 – Pre-Application Advice Report February 2025



Quality Information

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Revision History

Revision

01

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Details

Issue to ECU

Authorised

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Reference no:	23/01810/PREMAJ	Date of Issue:	7 June 2023
Proposal:	The proposed development is a pumped storage hydro project with a capacity of up to 900MW named Fearna PSH	Address:	Land 4390m NW of Kingie Lodge, Invergarry
Case officer:	Roddy Dowell	Email and phone no:	roddy.dowell@highland.gov.uk
Confidentiality Requested			

This pre-application advice has been specifically prepared for Gilkes Energy as the applicant and as the agent for the proposed development at Land 4390m NW of Kingie Lodge, Invergarry

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Description of proposal
The proposed development is a pumped storage hydro project with a capacity of up to 900MW named Fearna PSH.
Summary of Key Issues
Pumped Storage Hydroelectric schemes are national developments, identified in National Planning Framework 4. As such, the need for such projects is established. Highland Council are supportive of renewable energy developments and its supporting infrastructure where it can be appropriately sited and designed to not be significantly detrimental overall, either individually or cumulatively with other developments. However, the site is significantly challenging with the matters identified within the preapplication response below raising a number of concerns that will need to be addressed with further information provided. For instance: - Landscape and visual impacts upon the Kinlochhourn-Knoydart-Morar Wild Land Area (WLA 18), Moidart, Morar and Glen Shiel Special Landscape Area and West Inverness-shire Lochs Special Protection Area/Site of Special Scientific Interest. This is both for the project in isolation and any cumulative schemes. The proposal will require to be accompanied by suitable visualisations, for when the scheme is complete, and the landscaping matured but also for interim periods throughout construction and establishment of the landscaping to consider the worst case scenario. A robust and well thought out mitigation strategy will also be required, with careful consideration given to design, exposed materials, soft landscape mitigation and ongoing maintenance of the appearance of structures. NatureScot note if the proposal significantly affects the qualities of this landscape and the mitigation proposed to reduce impacts are deemed insufficient, this may lead to a NatureScot objection. - Clear information needs to be provided on the phasing of the works; a series of plans showing exploratory works, enabling works and final construction works for the proposed development is

required.

- The proposed development will result in the disturbance of carbon rich soils and peatland. A Peat Management Plan is required which should confirm the volume of peat disturbed by the development (including a calculation of peatland that will be inundated) and how it will be used in successful restoration to form a functioning peatland system capable of achieving carbon sequestration.
- The proposed development will need to deliver biodiversity enhancement in compliance with Policy 3 – Biodiversity of NPF4. A Biodiversity Enhancement and Management Plan will also be required.
- A full assessment of the ecology at the site is required to determine if there are particular ecological/environmental constraints associated with the proposed development.
- A full assessment is required to consider the cumulative impact of disturbance/displacement of black throated divers and common scoter within the SPA from increased traffic and construction.
- An assessment of the C1144 Kinloch Hourn Road's capability to accommodate the predicted vehicle movements is required for both the construction and ongoing operation of the proposed development. A Construction Traffic Management Plan with access improvements is required.
- The existing junction and access road layout should have the capacity to accommodate HGVs passing each other without blocking back to the trunk road. A Transport Assessment and an Abnormal Load Route Survey is required with forecast HGV movements using the trunk road.
- An Outdoor Access Plan or Access Management Plan is required to address the proposed development's potential impact on public access during preparatory works, construction works and once the scheme is operational. All the local public rights of way shall be included for the baseline study along with s Red (Specification) path survey.
- A Flood Risk Assessment should be submitted to demonstrate that the development will remain operational during flood events and will not increase flood risk elsewhere. A Drainage Impact Assessment is required. Impacts upon Ground Water Dependant Terrestrial Ecosystems will also need to be considered. The proposed development will require a CAR application which should be aligned with the Section 36 consent.
- Mitigation measures regarding private water supplies e.g. excavations outwith existing groundwater abstraction and risk assessment.
- Pollution and amenity impacts will need to be addressed e.g. noise impact assessment, dust plan and spoil management plan.
- Details of external lighting with night time visualisations.

Background Information

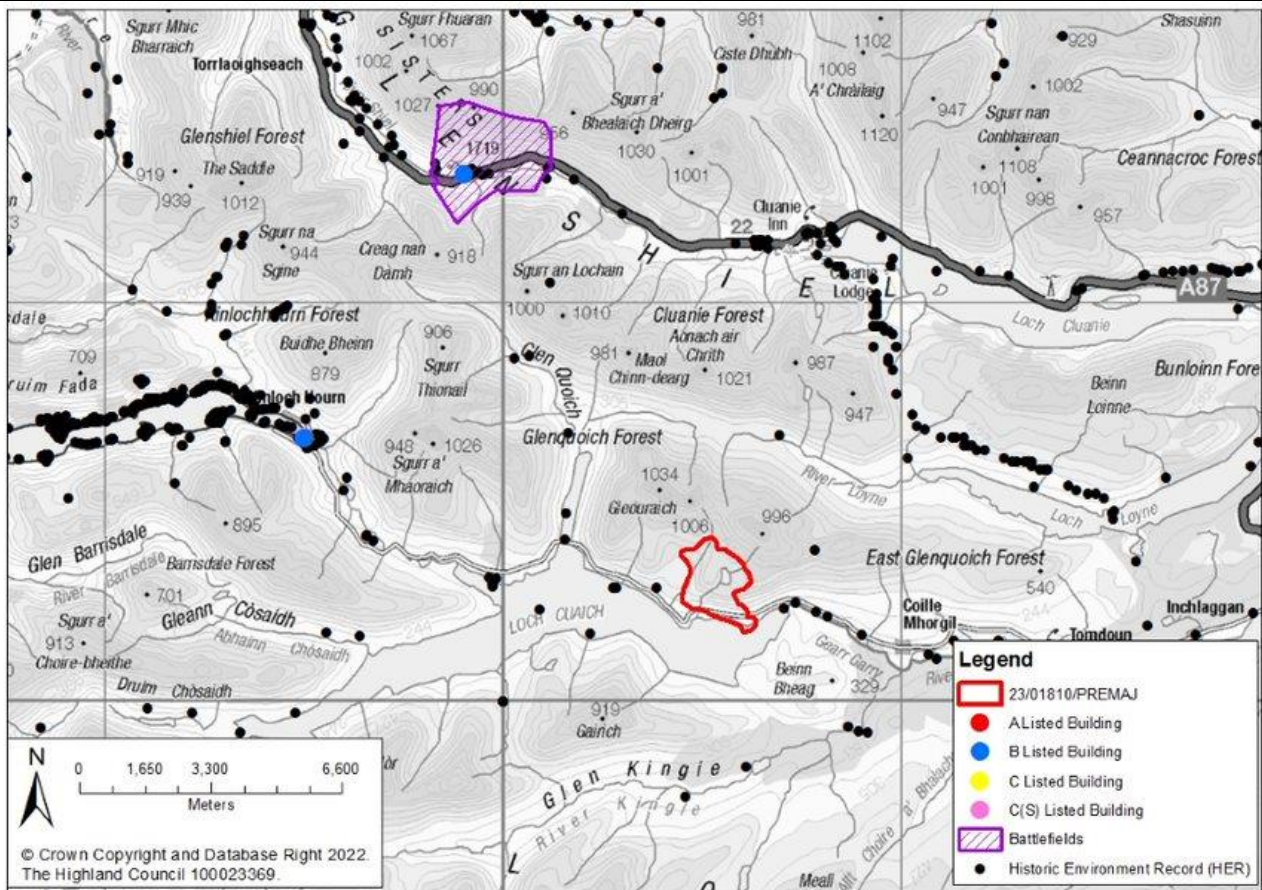
Site Area	Approximately 2.6km2	
Existing Land Uses	None	
Grid Reference	205567 (E)	803108 (N)

Consents Required

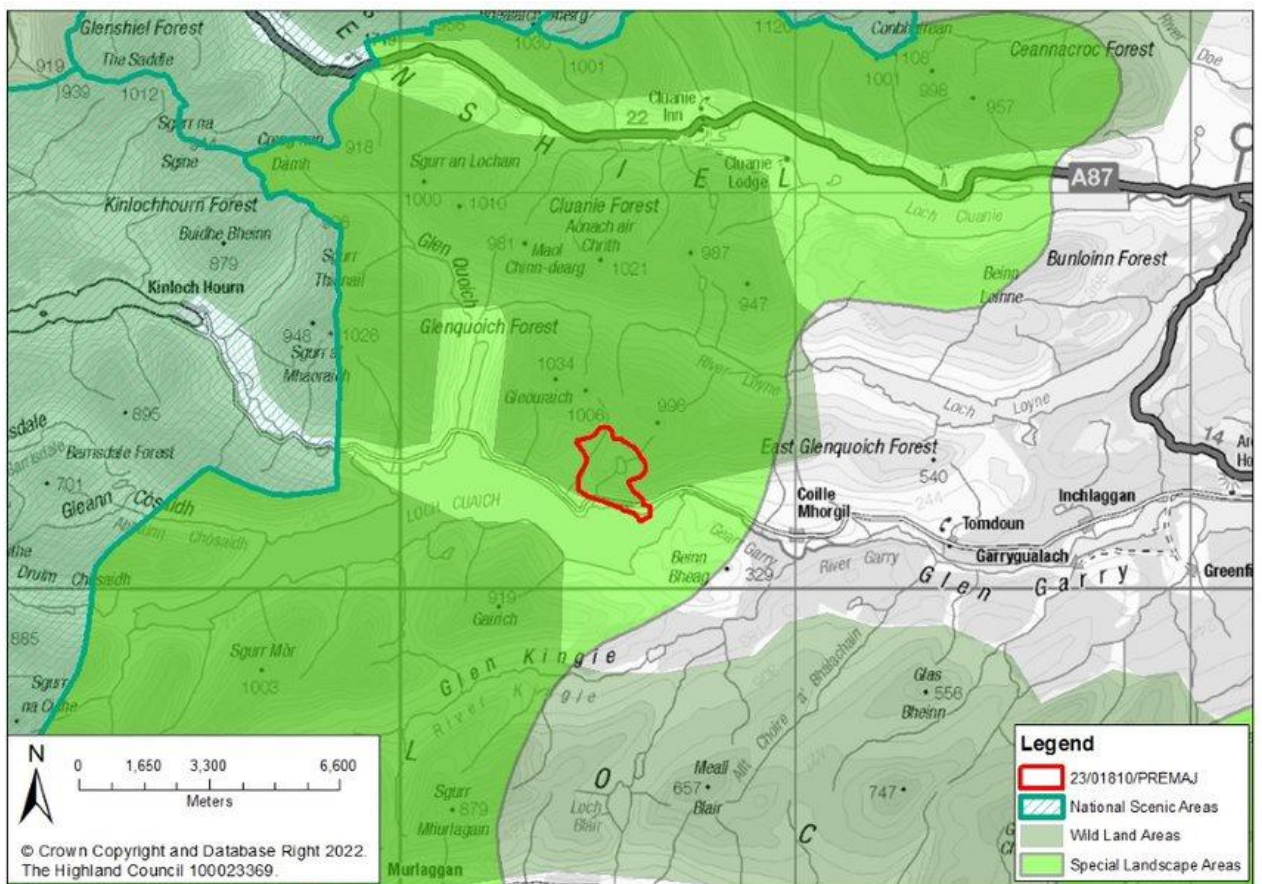
You are advised that the following consent(s) will be required for the proposed development:
Section 36 consent

Site Constraints Map

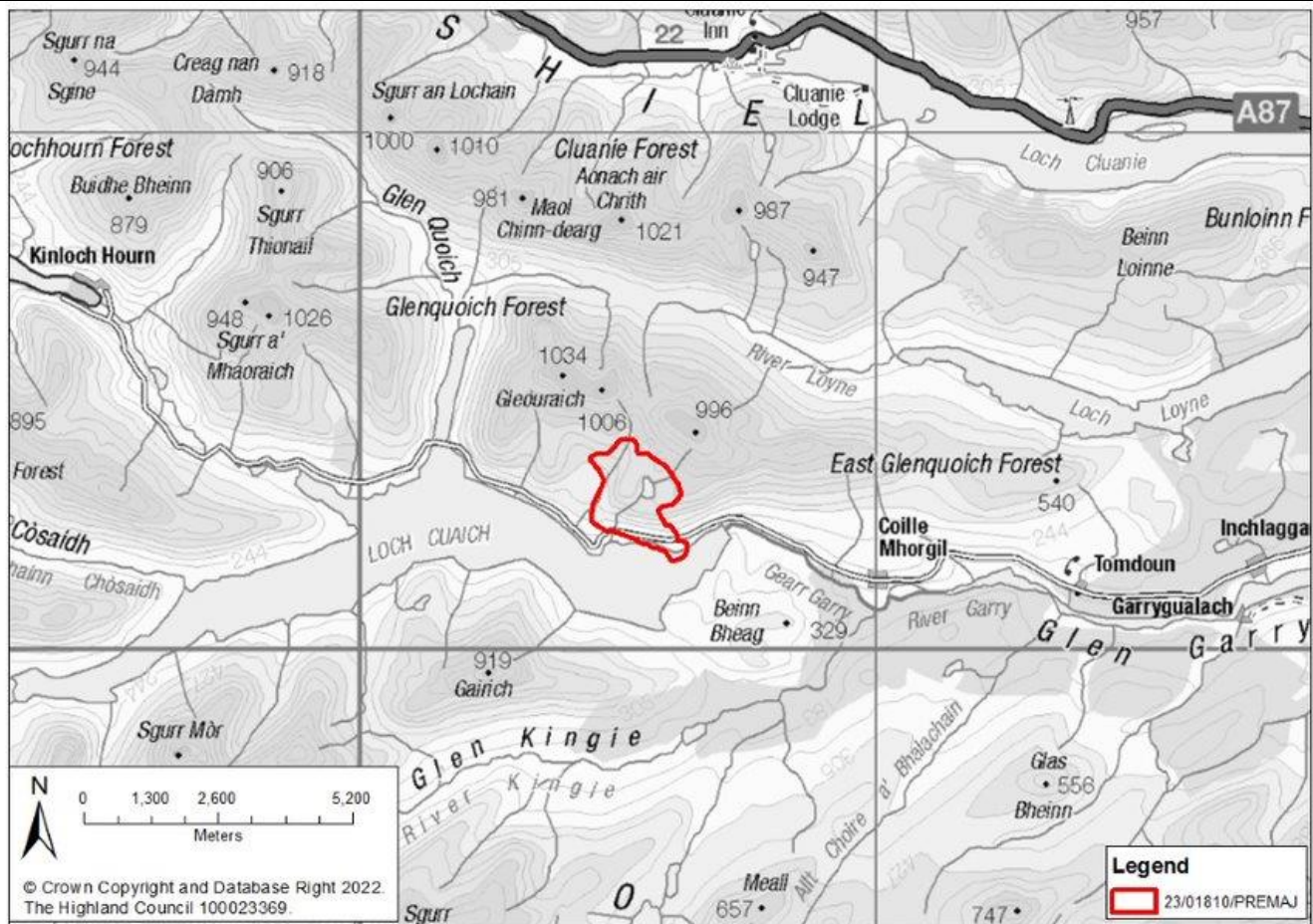
Built Heritage



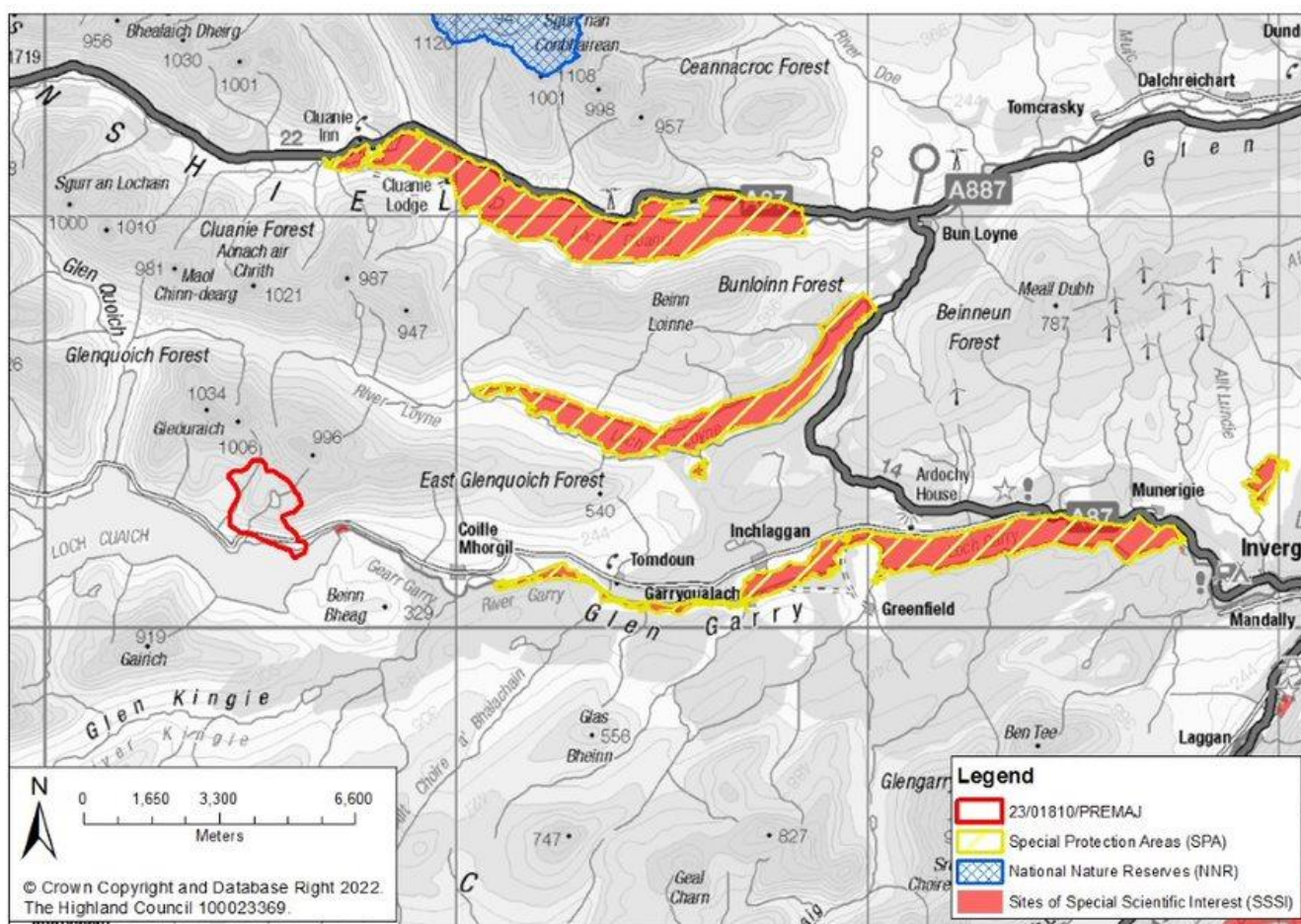
Landscape Designation



Location



Natural Heritage Designations



Supporting Information Requirements			
Abnormal Load Assessment	X	Open Space Strategy	
Access Management Plan	X	Operational Noise Assessment	
Arboricultural Impact Assessment		Peat Management Plan	X
Archaeological Site Investigations		Planning Statement	
Assessment of Impact on Historic Environment		Pre-Application Consultation Report	
Aviation Impact Assessment		Private Water Supplies/Mitigation scheme	
Borrowpit Management Plan	X	Protected Habitat Survey	X
Carbon Balance Assessment		Protected Species Survey	X
Compensatory Planting Plan		Restoration/Decommissioning Plan	X
Construction Noise Assessment – Scheme of best practicable means		Retail Impact Assessment	
Construction Traffic Management Plan	X	Schedule of Mitigation	X
Contaminated Land Report		Shadow Flicker Assessment	
Design and Access Statement	X	Street Elevations	
Development Brief		Structural Survey	
Drainage Impact Assessment	X	Sustainable Design Statement	
Dust Survey	X	Swept Path Analysis	X
Electric Car Charging Strategy		Transport Assessment	X
Flood Risk Assessment	X	Transport Statement	
Forest Residual Waste Strategy		Tree Constraints Plan	X
GWDTE Assessment	X	Tree Protection Plan	
Habitat Management Plan	X	TV / Radio Impact Assessment	
Landscape and Visual Impact Assessment	X	Vibration Assessment	
Landscape Maintenance/Management Plan		Visualisations	X
Landscape Plan		Waste Strategy	
Masterplan		Other (Please Specify):	
		Biodiversity Enhancement and Management Plan	X
		Wild Land Impact Assessment	X
		Construction Environmental Management Plan	X
		Noise Impact Assessment	X
		Spoil Management Plan	X

Planning history			
Previous Reference	Description	Date of Decision	Outcome
16/04506/FUL	Construction of a hydropower scheme on Allt Fearnna, on the East Glenquoich Estate	18 October 2017	APPLICATION REFUSED

Planning Policy
<u>National Planning Framework 4 (Adopted 2023)</u> 1 - Tackling the climate and nature crises 3 – Biodiversity 4 – Natural places 5 - Soils 11 – Energy 12 – Zero Waste 14 – Design, quality and place 22 – Flood risk and water management 29 - Rural development 33 – Minerals
<u>Highland-wide Local Development Plan (Adopted 2012)</u> 28 - Sustainable Design 29 - Design Quality & Place-making 30 - Physical Constraints 31 - Developer Contributions 36 – Development in the Wider Countryside 52 - Principle of Development in Woodland 53 – Minerals 54 - Mineral Wastes 55 - Peat and Soils 56 – Travel 57 - Natural, Built & Cultural Heritage 58 - Protected Species 59 - Other important Species 60 - Other Importance Habitats 61 - Landscape 62 - Geodiversity 63 - Water Environment 64 - Flood Risk 65 - Waste Water Treatment 66 - Surface Water Drainage 67 - Renewable Energy Developments 69 - Electricity Transmission Infrastructure 72 - Pollution 73 - Air Quality 77 - Public Access 78 - Long Distance Routes
<u>Highland Council Supplementary Guidance</u> Developer Contributions (November 2018)

Flood Risk & Drainage Impact Assessment (Jan 2013)
 Green Networks (Jan 2013)
 Highland Historic Environment Strategy (Jan 2013)
 Highland's Statutorily Protected Species (March 2013)
 Managing Waste in New Developments (March 2013)
 Physical Constraints (March 2013)
 Public Art Strategy (March 2013)
 Roads and Transport Guidelines for New Developments (May 2013)
 Special Landscape Area Citations (June 2011)
 Standards for Archaeological Work (March 2012)
 Sustainable Design Guide (Jan 2013) Trees, Woodlands and Development (Jan 2013)

Scottish Planning Policy and Guidance

Scottish Energy Strategy (Dec 2017)
 Historic Environment Policy for Scotland (HEPS, 2019)
 PAN 1/2011 - Planning and Noise (Mar 2011)
 Circular 1/2017: Environmental Impact Assessment Regulations (May 2017)
 PAN 60 – Planning for Natural Heritage (Jan 2008)
 2020 Routemap for Renewable Energy (Jun 2011)
 Wind Farm Developments on Peat Lands, Scottish Government (Jun 2011) (whilst not a wind farm the document contains relevant information for other developments which may involve peat)
 Energy Efficient Scotland Route Map, Scottish Government (May 2018)
 Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (Sep 2020)
 Scottish Land Use Strategy 2021-2026 (2021)

Policy Appraisal

Advice from Development Plans Team

Principle of the Development

Any future planning application(s) will be considered and determined against NPF4 and the Council Development Plans identified below:

- [National Planning Framework 4 \(NPF4\) adopted in 2023](#)
- [Highland-wide Local Development Plan \(HwLDP\) adopted in 2012](#)
- [West Highland and Islands Local Development Plan \(WestPlan\) adopted 2019](#)
- And associated [Supplementary Guidance](#)

The following response does not attempt to detail all the policies within NPF4 or the Council Development Plans that may be relevant, instead, it is limited to the most relevant to the assessment of any future planning application for the proposal. It is however, recommended that the applicant/agent fully reviews and considers all relevant documents prior to a formal submission.

National Planning Framework 4 (NPF4) (2023)

NPF4 was adopted on 13 February 2023 and is now part of the Development Plan. It also replaces National Planning Framework 3 and Scottish Planning Policy. Full details of NPF4 are available on the [Scottish Government website](#).

NPF4 comprises three distinct parts:

- Part 1 – sets out an overarching spatial strategy for Scotland in the future. Outlining that Scotland is facing unprecedented challenges and that we need to reduce greenhouse gas emissions and embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing, and build a wellbeing economy while striving to create great places. Therefore, NPF4 sets out that choices need to be made about how we can make sustainable use of our natural assets in a way that benefits communities.
 The spatial strategy also reflects existing legislation by setting out that decision making requires to reflect the long-term public interest. However, in doing so, it is clear that the decision maker must make the right choices about where development should be located, ensuring clarity is provided over the types of infrastructure that need to be provided and the assets that should be protected to ensure they continue to benefit future generations. To that end, the Spatial Priorities support the planning

and delivery of sustainable places, which will reduce emissions, restore and better connect biodiversity; create liveable places, where residents can live better, healthier lives; and create productive places, with a greener, fairer, and more inclusive wellbeing economy. Annex C sets out 18 National Developments which are significant developments of national importance that support the spatial strategy. Pumped Hydro Storage is classed as a national development.

- Part 2 – sets out the National Planning Policy which cover three themes: Sustainable Places, Liveable Places and Productive Places; within which there are a total of 33 policies and many of these consist of distinct sub-policies. These 33 national planning policies form part of the Development Plan and will be assessed along with the Council's LDP policies for development management decisions.
- Part 3 – provides a series of annexes that provide the rationale for the strategies and policies of NPF4, which outline how the document should be used, and set out how the Scottish Government will implement the strategies and policies contained in the document. With Annex A: 'How to use this document' noting that the policies within Part 2 should be read as a whole and '...it is for the decision maker to determine what weight to attach to policies on a case-by-case basis....' It goes on to state that '...where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies....'.

The most relevant NPF4 policies to this proposal are as follows:

- Policy 1 (Tackling the climate and nature crises) is an overarching policy that requires 'significant weight' to the global climate and nature crises. The [8th February 2023 Chief Planner letter](#) provides specific advice on this policy and notes '...it will be for the decision maker to determine whether the significant weight to be applied tips the balance in favour for, or against a proposal on the basis of its positive or negative contribution to the climate and nature crises....'.
- Policy 3 (Biodiversity) requires all forms of development, to include appropriate measures to conserve, restore and enhance biodiversity proportionate to the nature and scale of development. The requirement to deliver biodiversity enhancement is a new duty. Sub-section b) of the policy requires national & major developments and developments that requires an Environmental Impact Assessment to meet all the following criteria:
 - i. the proposal is based on an understanding of the existing characteristics of the site and its local, regional and national ecological context prior to development, including the presence of any irreplaceable habitats;
 - ii. wherever feasible, nature-based solutions have been integrated and made best use of;
 - iii. an assessment of potential negative effects which should be fully mitigated in line with the mitigation hierarchy prior to identifying enhancements;
 - iv. significant biodiversity enhancements are provided, in addition to any proposed mitigation. This should include nature networks, linking to and strengthening habitat connectivity within and beyond the development, secured within a reasonable timescale and with reasonable certainty. Management arrangements for their long-term retention and monitoring should be included, wherever appropriate; and
 - v. local community benefits of the biodiversity and/or nature networks have been considered.

Consequently, before the scheme advances, detailed work will need to be undertaken to demonstrate compliance with this policy.

- Policy 11 (Energy) intends to encourage, promote and facilitate all forms of renewable energy development. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS).

Section a) notes development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, including pumped hydro storage.

Section c) confirms development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

Section d) confirms that proposals that impact on international or national designations will be assessed in relation to Policy 4.

Section e) requires project design and mitigation to demonstrate how the following impacts are addressed:

 - i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker,
 - ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

- iii. public access, including impact on long distance walking and cycling routes and scenic routes;
- iv. impacts on aviation and defence interests including seismological recording;
- v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;
- vi. impacts on road traffic and on adjacent trunk roads, including during construction;
- vii. impacts on historic environment;
- viii. effects on hydrology, the water environment and flood risk;
- ix. biodiversity including impacts on birds;
- x. impacts on trees, woods and forests;
- xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration;
- xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; and
- xiii. cumulative impacts.

In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets.

- Policy 4 (Natural Places): Seeks to protect, restore and enhance natural assets making best use of nature-based solution.

Section g) states that development proposals in areas identified as wild land in the Nature Scot Wild Land areas map will only be supported where the proposal:

- i. Will support meeting renewable energy targets, or
- ii. It is for small scale development directly linked to a rural business or croft, or is required to support a fragile community in a rural area.

All such proposal must be accompanied by a wild land impact assessment which sets out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the wild land, as well as any management and monitoring arrangements where appropriate.

- Policy 29 (Rural development) seeks to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced.

Other policies from NPF4 that will be relevant include:

- Policy 5 (Soils)
- Policy 12 (Zero Waste)
- Policy 14 (Design, quality and place)
- Policy 22 (Flood risk and water management)
- Policy 33 (Minerals)

Highland-wide Local Development Plan (HwLDP) (2012)

HwLDP was adopted in 2012 and sets out a range of planning policies applicable for the whole Highland Council area. HwLDP will continue to be used alongside NPF4, until it is replaced by a new style LDP. The Council notes that legislation and planning law indicates that if there is incompatibility between the LDP and the NPF, whichever is the more recent shall prevail. That requirement does not take away from the fact that the HwLDP must, whilst still part of the adopted Development Plan, be part of the consideration and, as such the following policies are considered relevant:

- Policy 28: Sustainable Design – assesses proposals on the extent to which they are compatible with a range of factors, including impacts on individual and community residential amenity and demonstrating high quality siting and design.
- Policy 57 Natural, Built and Cultural Heritage - All development will be assessed taking into account the level of importance and type of heritage features, the form and scale of development and any impact on the feature and its setting. HwLDP provides more details on the criteria which apply to each of the three categories of importance: international, national and local/regional. The applicant will be required to demonstrate that there is no significant impact on the features covered by this policy, and this should include the following features which are in close vicinity of the site:
 - Quoich Spillway SSSI
 - West Inverness-shire Lochs SPA/SSSI
 - Glen Affric National Nature Reserve
 - Knoydart NSA
 - Moidart, Morar and Glen Shiel SLA
 - WLA 18 Kinlochhourn-Knoidart-Morar
- Policy 61 Landscape - requires new development to reflect the landscape characteristics and special qualities identified in the relevant, refreshed and published (2019) NatureScot (formerly SNH)

Landscape Character Assessments (LCAs). The LCAs are a starting point on which to base assessment of landscape and visual impact. It is important to set out who the visual receptors of the development are, what the landscape impacts are and how these two factors relate. <https://www.nature.scot/professional-advice/landscape/landscape-character-assessment>.

- Policy 67 Renewable Energy Developments – whilst the proposal being pumped storage, is not generally classified as a renewable energy technology, it is an important contributor to the energy mix, with the potential to support current and future renewable energy strategies and policies. Energy storage has the potential to enable greater penetration of renewable technologies onto the grid where intermittency of generation or spikes in demand require there to be some back up supply from energy storage technologies including pumped storage hydro. Due to this crucial link, Policy 67 is addressed. It supports proposal that contribute towards meeting renewable energy generation targets. Notwithstanding that this proposal has the potential to make a significant contribution to the decarbonisation of energy generation, this support is subject to addressing important key issues and other criteria. The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a number of considerations as set out in this policy. This includes both individual impacts and cumulative impacts with other energy schemes. Should the project progress, it will be important to maintain an up-to-date picture of development in the wider area, particularly for informing cumulative impact assessment. A starting point for this is the Council's Highland Hydro Storymap (last updated January 2018) and the Highland wind turbine map (last updated January 2023).

Other key policies from HwLDP that are also relevant are:

- Policy 30 – Physical Constraints
- Policy 31 – Developer Contributions
- Policy 36 – Development in the Wider Countryside (with respect to other developments that may be proposed in the area)
- Policy 53 – Minerals
- Policy 55 – Peat and Soils
- Policy 56 – Travel
- Policy 58 – Protected Species
- Policy 59 – Other Important Species
- Policy 60 – Other Important Habitats
- Policy 63 – Water Environment
- Policy 64 – Flood Risk
- Policy 66 – Surface Water Drainage
- Policy 69 – Electricity Transmission Infrastructure
- Policy 72 – Pollution
- Policy 77 – Public Access

Review of Highland-wide Local Development Plan

The Council began a review of HwLDP, with the publication of the Main Issues Report in September 2015 and subsequent consideration of the comments received in 2016. In December 2017, the Scottish Government published the Planning Bill outlining changes to the Scottish planning system. At that point, the Council agreed that the Council's Highland-wide Local Development Plan, and the general planning policies it contains, remain largely fit for purpose and that a full review of the plan should only commence once the Planning (Scotland) Act 2019 was fully enacted and the new arrangements for Local Development Plans had been confirmed, including the transitional arrangements. This means that the Council will recommence the review of HwLDP, under the new arrangements, expecting to make a formal start once the Development Plan Regulations and Guidance have been finalised by Scottish Government, which in turn is expected in spring 2023. In light of adopted NPF4, there is anticipated to be a reduction in the number and range of policies needed in the new Highland Local Development Plan.

Applicants are advised to monitor the annual Development Plans Newsletter as this provides a timetable of work on the Highland development plan. The March 2023 Development Plans Newsletter is now available on the Council's website.

The preparation of a new-style Highland Local Development Plan (HLDP)

Having noted the above background: it is the Council's intention to undertake the evidence-gathering stage of the new LDP throughout 2023, with the tentative programme including an Evidence Report in 2024 and subsequent Gate Check, with Proposed Plan stage in 2025. As part of this programme of work, the Council will review the coverage and content of its current suite of Supplementary Guidance, to establish which aspects should be covered within the new Local Development Plan itself, which aspects should be covered

within non-statutory planning guidance and any aspects no longer required.

Area Local Development Plan – West Highland and Islands Local Development Plan (WestPlan) (2019)

The Highland Council Area Local Development Plan covering the proposed site is the West Highland and Islands Local Development Plan adopted in 2019. This plan's focus is on the regional and settlement strategies of the West Highland and Islands area. Its primary focus is on identifying specific site allocations and as such, much of the content of the plan is not directly relevant to this proposal. However, certain aspects of the strategy for the local area/settlement may help to inform plans for community engagement or community benefit.

WestPlan defines boundaries (including any refinements) of the Special Landscape Areas (SLAs) across the plan area. The SLA citations webpage provides the most up to date information on SLAs. The proposal sits within Moidart, Morar and Glen Shiel SLA.

Sustainability

Sustainable Design Guide

The [Council's Sustainable Design Guide: Supplementary Guidance](#) provides advice and guidance on a range of sustainability topics, including design, building materials and minimising environmental impacts of development. A Sustainable Design Statement is required.

The Council encourage the inclusion of electric car charging facilities within all new developments. A strategy for the provision of charging points within the development should be submitted with the application.

Climate Change and Ecological Emergency

The Council recognises the importance of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, as the legislative tool for addressing Scotland's Climate & Ecological Emergency, which the Council committed to under its own Climate and Ecological Emergency declaration in May 2019.

Furthermore, given Highland's land mass and geography make up and renewable energy resources, it is accepted that the area has enormous potential to significantly contribute to the production of renewable energy. However, this commitment has to be taken in balance along with all other considerations of a particular site. It is appreciated that the proposal would add to the country's installed capacity for renewable energy generation; however, renewable energy developments should still be located, sited and designed appropriately.

Furthermore, given Highland's land mass, geography make up and renewable energy resources, it is accepted that the wider area has enormous potential to significantly contribute to the production of renewable energy. It is appreciated that this pre-application proposal would add to the country's capacity for energy storage, which has the potential to enable greater penetration of renewable technologies onto the grid where intermittency of generation (for example wind and solar generation) or spikes in demand require there to be some back up supply from energy storage technologies. However, notwithstanding that and NPF4's strong position of "in principle" support for renewable energy developments, and for energy storage in national development 2 and Policy 11 (and proposed adjusted position on wild land areas, whereby its constraining effect on development would be less extensive), such developments should still be located, sited and designed appropriately and thus comply with the wider development plan policies.

Highland Council Decarbonisation Strategy

The Council is currently preparing its Decarbonisation Strategy as part of its ambitions for Net Zero, such as fuel/energy options for its fleet of vehicles, alongside other opportunities. To discuss any opportunities this proposal may bring to the Council strategy, early contact with Neil Osborne, Climate Change Manager (neil.osborne@highland.gov.uk) is advocated.

Decommissioning

While the project will likely seek a consent for a number of years, provisions should be made for decommissioning of the development either if the project is not progressed beyond initial works, is not completed or if the project no longer is viable to operate. An outline decommissioning and restoration plan should accompany the application and any EIA should consider the impact of decommissioning.

Natural Heritage

Advice from NatureScot

Landscape Sensitivity

A Landscape and Visual Impact Assessment will be required to help assess compatibility with NPF4 Policy 4. Within your assessment you will need to consider sensitive receptors, including those that reside in the

area and those who visit it, with receptor locations particularly including areas of settlement, transport routes and visitor and recreational attractions and routes. The proposal sits within Wild Land Area 18 Kinlochhourn-Knoydart-Morar. NatureScot has prepared the following guidance – Assessing Impacts on Wild Land Areas: Technical Guidance (September 2020).

Effects on Wild Land Areas (WLA's)

The proposal sits almost entirely within Kinlochhourn-Knoydart-Morar Wild Land Area (WLA 18). This WLA is characterised by high mountains, which are steep, rugged and physically challenging; they are irregular in profile, have predominant rock cover that convey a “rawness” and often harbour high altitude lochans, which all amplify the sense of remoteness. From the tops there are stunning panoramic views of rocky ridges continuing far into the distance that seem arresting by virtue of their great number and extent. These views are most attractive especially when looking down onto loch waters. The creation of a dam and associated engineering works at Loch Fearn, the construction of the penstock and the track to the dam would create a distraction from the prevailing sense of solitude and remoteness in this place. The impact would be exacerbated by the fact that this engineering work would be away from other buildings or structures in this area, which tend to be located close to the road, and not at such an elevation. The intakes to other hydro developments in the area are relatively small in that they do not involve enlarging a lochan to create a storage reservoir and do not include the construction of a dam and spillway. Additionally, existing schemes are much lower (no higher than approximately 400m above sea level at Allt a'Mheil), compared with this proposal which would involve extensive construction works including a substantial borrow pit at a significant elevation of approximately 540m above sea level.

The proposed development could potentially result in significant adverse effects and cumulative effects in relation to the highly sensitive landscape of the nationally important Kinlochhourn-Knoydart-Morar Wild Land Area. Should effects on this WLA be found to significantly affect the qualities of this landscape and the mitigation proposed to reduce impacts on this WLA are deemed insufficient, this may lead to a NatureScot objection.

Given the siting and assumed predicted theoretical visibility of the proposal and to allow NatureScot to better understand the potential effects from the proposal on the key attributes and qualities of WLA a Wild Land Impact Assessment will be required.

NatureScot also advise that cumulative effects on WLA 18 be included. This should consider all elements of the proposed development i.e. access tracks, built form, dams and impoundments, and borrow pits. When considering which proposals to include within the cumulative assessment they consider that The Highland Council are best placed to advise.

Should there be a requirement for external lighting of the proposed development. NatureScot advise that effects from lighting on WLA 18 be considered, given predicted visibility of the proposal from this area and the high sensitivity of WLA's to the effects of lighting. There may also be a requirement for night time visualisations. It should also be noted that the cumulative effects of lighting may also be required.

Effects on Special Landscape Area (SLA's)

The proposed development lies within the Moidart, Morar and Glenshiel Special Landscape Area, which includes upper Glen Kingie and the long-established hydro landscape of Loch Quoich, dating from 1955. The mountains, glens and lochs of this area extend over a vast area, and coupled with difficulty of access and sparse habitation, produces a strong sense of remoteness and solitude within the interior. Whilst the draw down shorelines of Loch Quoich detract somewhat from the area's visual appeal, this is offset by the grandeur of the surroundings. The development would be visible in views from the west, the south and through to the north east. Views from the public road would be the most frequented viewpoint with visibility along a section of the road. The powerhouse and the penstock, where it crosses the front face of the hill would be conspicuous from here and locally significant. It is acknowledged that there are pylons and telegraph poles running parallel with the road across the hillside in this area already, which already reduces the visual appeal of the glen to some extent. The powerhouse would, however, be the first of 4 powerhouses along approximately 6km stretch of road; Allt Mheil and Allt Peitreach schemes further along, and that for Allt Eirichaellach is beyond the road bridge over the northern extension of Loch Quoich. The development has the potential to reduce the sense of remoteness and solitude of the SLA.

West Inverness-shire Lochs Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI)

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the “Habitats Regulations”) apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Further information on the legislative requirements of European sites can be found at:

<https://www.NatureScot.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species/legal-framework/habitats-directive-and-habitats-regulations>

The development lies within 10km of West Inverness-shire Lochs SPA designated for black-throated diver and common scoter. The proposed development will impound Loch Fearn, which is situated mid-way between Loch Garry and Loch Houran above Loch Quoich. Loch Quoich is proposed as the lower loch. Access to the development will be taken along Glen Garry adjacent to the SPA.

NatureScot notes that Loch Fearn could support nesting common Scoter. A pair have been seen this year. It is not certain that the birds were nesting on the loch but it seems likely given the time of year they were surveyed. The applicant should seek further information from RSPB on scoter in the area.

Given the lochs proximity to the SPA NatureScot advise that any scoter at Loch Fearn should be considered as being connected to the West Inverness-shire Lochs SPA population. NatureScot do not know enough about movements of scoter between lochs to exclude the possibility that they are part of an interconnected local meta population with the SPA birds. The conversion of Fearn to a hydro loch would make it unsuitable for breeding scoter which could impact the SPA and wider scoter population. Therefore, any assessment of impacts on the SPA should include Loch Fearn.

In addition, there is a very significant, and possibly long-term, disturbance issue from cumulative impacts, from other construction projects; such as the Skye Reinforcement Project and Coire Glas Connection Project and their associated infrastructure improvements. Although the Loch Fearn PSH is not in or adjacent to the SPA, access for works machinery will be taken along the glen to the work site. This, in combination with other works taking access along the glen, will potentially increase disturbance levels for the features of the SPA. Therefore, NatureScot advise that assessments consider the cumulative impact of disturbance/displacement of black throated divers and common scoter in the SPA from increased traffic and construction. This should include the temporal elements e.g. the number of years that construction work for all the schemes will cumulatively impact the SPA. NatureScot also understand that redundant overhead lines will be removed following the new overhead line coming online. This should also be included in any cumulative and temporal assessments.

Further information on the designated sites noted above, including the protected features and conservation objectives, can be found on SiteLink, see: <https://sitelink.nature.scot/home>. NatureScot would be happy to discuss with the applicant directly their proposed methods of assessment, to ensure that that it will adequately cover everything required in a Habitat Regulations Appraisal (HRA).

Impact on Protected Species

NatureScot recommend that the applicant undertake appropriate surveys and implement any necessary mitigation for protected species and birds in line with NatureScot guidance at:

<https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice>.

We advise that the applicants contact the RSPB and Highland Raptor Study Group to request records of any Schedule 1 birds that may be present in the area.

Visual Impact

Overall, detailed attention to design will be important to the experience of the development from people out in the landscape, this should extend to careful consideration of exposed materials, soft landscape mitigation and ongoing maintenance of the appearance of structures.

The visual impact of the proposal will be most prominent during the construction period and until the time that the landscaping proposed to screen and integrate the development into the landscape has matured. Through careful design of the infrastructure there will be opportunity to mitigate visual impacts by design.

Impact and visibility of access tracks in the landscape should be considered, taking into account the excavation and building up of ground required for the access tracks. The route will need to be looked at to reduce the overall impact. The regrading of land and contouring of the land for the tracks should be carefully engineered to mitigate the effects – details should be submitted with the application.

Design for the dams will require comprehensive plans for the landscaping and stone dressing with details of the design options and evolution of this process.

Extent of Visibility

No ZTV has been provided, however, NatureScot consider that there is likely to be far reaching visibility of the proposal to the south, south-east and south-west. NatureScot advise that combined ZTVs are produced to show the predicted visibility of each of the proposed scheme components i.e. dam embankment, upper reservoir, access track (upper and lower) and powerhouse. This will also enable NatureScot to advise on the selection of suitable assessment points and viewpoints to ensure all predicted effects on Wild Land are captured.

Viewpoints and Photomontages

Photomontages should clearly show the relevant elements of the scheme i.e. impoundment dam/embankment, impounded waterbody, drawdown area, tail pond inlet/outlet, substation, access tracks, borrow pits and drawdown scars. Impoundments can result in variable water levels causing a drawdown scar, which is likely to have increased visibility from a distance, creating a new visual focus in the landscape. Impacts can arise from the direct visual effect of this new feature, or from the perceived effects on wild land quality. Assessment of the landscape and visual impact of the likely drawdown maximum and minimum levels (natural and managed) and the duration of the maximum and minimum levels and the timing (season) should be considered.

Photomontages and design sections should show planting/landscape mitigation proposals at year 1 and year 15.

NatureScot would welcome consultation on final viewpoint selection to ensure that all potential effects on WLA 18 are captured.

Visualisations

The proposal will require to be accompanied by suitable visualisations to both Highland Council Standards and NatureScot Guidance. These should include visuals for when the scheme is complete, and the landscaping matured and for interim periods throughout construction and establishment of the landscaping to consider the worst case scenario. The proposed viewpoint locations are appropriate, but the applicants should also include viewpoints from the access track. Suggested locations being in the vicinity of the existing reservoir and from the Shios Dam end. At present the paths and tracks in the area allow for a partially looped route as the northern lochan is ringed by paths/tracks. The developers should explore whether a new looped path around the enlarged reservoir is feasible to protect and enhance this accessibility, and how the level of amenity and access may be maintained or compensated.

Mitigation

Demonstration of mitigation through design should be detailed in any future submission; in relating to reducing impacts on WLA's. Given the proposal location within a landscape of high sensitivity to development NatureScot request that various options are explored throughout the design evolution of this proposal. This will illustrate where mitigation has been used to reduce the significance of effects on this very sensitive landscape.

The primary components of the proposal which are likely to result in significant effects on WLA 18 include:

- New access tracks and any upgrading of existing access tracks. New access tracks within wild land areas will change the physical fabric of the landscape. Careful consideration should be given to the need for, alignment and finish of any track to ensure that the character and qualities of the WLA as described are not significantly affected;
- Dams and impoundments. The physical extent of the dams and their subsequent inundations is a major component of the proposal which NatureScot are not able at this stage to give detailed advice on, however, to enable a better understanding of the effects a series of sections and photomontages would assist NatureScot. As with any development of this scale within a WLA its scale, design and finish should reflect the high quality of the landscape in which it is within; and
- Powerhouse/built form associated with the development.

The proposals must be accompanied by a Wild Land Impact Assessment which sets out how design, siting, or other mitigation measures have been and will be used to minimise significant impacts on the qualities of the Kinlochhourn-Knoidart-Morar WLA (WLA18).

Impact on Trees

The area within the red line site boundary does not appear to contain any trees or woodland outwith a small area adjacent to the Allt Fearn watercourse below Loch Fearn. It is recommended that the applicant identify any trees within the site in a Tree Constraints Plan and use this to help inform the layout of the development, wherever possible, in order to minimise the impact on any existing trees on and adjacent to the site. The below policy is relevant:

- Policy 51 (Trees and Development) of the Highland wide Local Development Plan states that "The Council will support development which promotes significant protection to existing hedges, trees and woodlands on and around development sites".
- Policy 52 (Principle of Development in Woodland) of the Highland wide Local Development Plan states that "The applicant is expected to demonstrate the need to develop a wooded site and to show that the site has capacity to accommodate the development. The Council will maintain a strong presumption in favour of protecting woodland resources.

Development proposals will only be supported where they offer clear and significant public benefit. Where

this involves woodland removal, compensatory planting will usually be required".

In addition, Policy 6b) of NPF4 notes that "Development proposals will not be supported where they will result in...Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition". Where woodland loss would be necessary to develop a site then the Scottish Government's policy on the Control of Woodland Removal (CoWR) will apply. The guiding principles of the policy note that "There is a strong presumption in favour of protecting Scotland's woodland resources" and "Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits. In appropriate cases a proposal for compensatory planting may form part of this balance".

NPF4 Policy 6 c) notes that "Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered". The CoWR also notes that there will be a strong presumption against removing ancient semi-natural woodland.

Advice from SEPA

Impact on Peat

This development will result in the disturbance of carbon rich soils and peatland. Information to meet the requirements of National Planning Framework 4 Policy 5d should be provided. This should include detailed peat depth and peatland quality information and it should clearly demonstrate how the mitigation hierarchy has been applied. Engineering works should be shown to avoid the areas of deepest peat and minimise the footprint of development within areas of peat.

The submission must include:

- A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Guidance on Developments on Peatland - Peatland Survey (2017) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
- A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.

Proposals should be, where relevant, in line with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).

A draft Peat Management Plan should be provided which should confirm the volume of peat to be disturbed by the development (including a calculation of peatland that will be inundated) and how it will be used in successful restoration to form a functioning peatland system capable of achieving carbon sequestration. It seems very likely that more peat will be disturbed than can be used in site reinstatement. SEPA suggests that the Peat Management Plan clearly identifies the volumes of peat which may require to be put to other uses and identifies what they are, but that any proposals for peatland restoration are contained within a Habitat Management Plan. The Habitat Management Plan should provide proposals for peatland and habitat restoration with plans included showing areas for proposed works.

Under National Planning Framework 4 (NPF4) Policy 3 provides for an expectation of nature enhancement and biodiversity being left in a demonstrably better state than before development. This is particularly relevant when considering the implications of this proposal for peatland habitats and producing an appropriate Habitat Management Plan. In accordance with the mitigation hierarchy applicants are encouraged to avoid adverse impacts on peat as far as possible, and to minimise any residual impacts through best practice. Following detailed ground investigations, the final Construction Environmental Management Plan and Peat Management Plan should demonstrate that this approach has been followed.

Further advice on peatland restoration is available on our Peatland Action website: <https://www.nature.scot/climate-change/nature-based-solutions/peatland-actionproject/peatland-action-project-resources> and <https://www.nature.scot/doc/peatland-actiontechnical-compendium>. While this guidance is aimed at those applying for Peatland Action grants it contains advice on best practice which would also apply in a development context.

Advice from Ecology Officer

Ecology

At this stage limited ecological/environmental information has been submitted, therefore, the Ecology Officer cannot give detailed advice on the ecological/environmental aspect of the proposal. Further advice will be given at the Scoping stage of the development but as a general guide the following information is recommended:

A full assessment of the ecology of the site and a suitable buffer around the site needs to be undertaken to determine if there are any ecological/environmental constraints associated with the proposed development. The assessment should include (but not be limited to):

- Desk study records, from NatureScot Sitelink, the NBN atlas and local biodiversity record groups;
- Specific surveys of the site to identify any protected species, priority habitats and priority species, including those listed within the Highland Nature Biodiversity Action Plan to fulfil Policies 57-60 of the Highland Wide Local Development Plan;
- Assessment of ecological effects; and
- Relevant mitigation and compensation measures.

Surveys should be undertaken by a suitably qualified and experienced Ecologist. NatureScot's guidance on surveying protected species should be followed: <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development- advice/planning-and-development-protected-species>.

Policies 57-60 of the Highland Wide Local Development Plan (HwLDP) pertain to the protection of certain species and habitats within the Highland region that must be considered for any developments:

https://www.highland.gov.uk/info/178/development_plans/199/highlandwide_local_development_plan.

The Highland Nature biodiversity Action Plan (HNBAP) lists priority species and habitats that are considered to be important within the Highland region. These priority species and habitats must be given consideration for any developments: <https://www.highlandenvironmentforum.info/biodiversity/action-plan/>

Environmental Enhancement

The proposed development will need to accord with the policies of NPF4 including Policy 3, which requires that all developments must deliver not just ecological mitigation and compensation but also biodiversity enhancement of the site. As this is a Major development, Policy 3b is applicable to this development.

In order to satisfy Policy 3b a Biodiversity Enhancement and Management Plan that details how criteria i to v will be met, will be required in addition to the EIA/EcIA. This will demonstrate that the development will significantly enhance the biodiversity of the site, from its pre-development state. Where the Biodiversity Enhancement and Management Plan is unable to demonstrate to the satisfaction of the planning authority that the development will conserve, restore and enhance biodiversity, the proposal will not be supported.

The Biodiversity Enhancement and Management Plan must demonstrate to the satisfaction of the planning authority that the development will accord with Policies 57-60 of the HwLDP.

The Biodiversity Enhancement and Management Plan will be carried out by a suitably qualified and experienced consultant and will include a Biodiversity Net Gain Metric (BNG) and demonstrate a minimum of a 10% increase of the biodiversity of the site post construction. It is recommended that the English Nature BNG Metric is used to determine the biodiversity enhancement, and this should be included within the planning application.

In rare cases where site constraints result in the applicant being unable to deliver one or more of the above criteria, consideration may be given to developer contributions as to enable biodiversity enhancements to be implemented elsewhere in line with the mitigation hierarchy to allow offset, off-site measures.

Design

Design Quality and Placemaking

The Design Quality and Place Making policy (policy 29) in the HwLDP requires new development to be designed to make a positive contribution to the architectural and visual quality of the area. Furthermore development proposals must demonstrate sensitivity and respect towards the local distinctiveness of the landscape, architecture, design and layouts of their proposals.

Careful consideration should be given to the need for, alignment and finish of any track. Details of groundworks associated with all infrastructure is required. Clear information needs to be provided on the phasing of the works; a series of plans showing exploratory works, enabling works and final construction works would be very helpful.

NatureScot note from other schemes of this nature that the grid connection and spoil from tunnel operations can have the potential to raise further impacts that may be insurmountable. Therefore, NatureScot advise that detail of the grid connection and spoil management is fully detailed in any application going forward. Clear information needs to be provided on the phasing of the works; a series of plans showing exploratory works, enabling works (including road improvements) and final construction works.

Design and Access Statement

The Design and Access Statement should outline the design principles and concepts that have been applied to the development and:

- (i) explain the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account.

- (ii) describe the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use.
- (iii) state what, if any, consultation has been undertaken on issues relating to the design principles and concepts that have been applied to the development; and what account has been taken of the outcome of any such consultation.

Further advice on the preparation of design statements is contained in the Council's advice note on [Design and Access Statements](#) and Scottish Government [Planning Advice Note 68](#).

In addition to the above, it is expected that the design chapter of the EIAR will outline the alternatives explored, which may include different design iterations or delivery of a different style of construction / different location for the proposal.

Amenity

Advice from Contaminated Land Team

Contaminated Land Team have no comments to make on this application.

Advice from SEPA

Waste Management

SEPA notes and welcomes the proposal that all excavated material can be used on site; it needs to be demonstrated that there is a genuine planning need for any works using the material so that it is not considered a waste disposal operation. There is also the need for consideration to be given to what will be done with any material that is not fit for this, or other project construction works. Temporary storage, processing and reuse elsewhere options should be outlined.

The application should include a Spoil Management Plan. This should include information in relation to the type and volumes of material that will be excavated on site accompanied by clear information on temporary storage (which is likely to require an extensive area), reuse on site and use or disposal elsewhere. Any material that cannot be appropriately used within the site works will be considered waste and waste management legislation would apply.

Noise Impacts – Operational

The applicant will be required to submit, a Noise Impact Assessment carried out by a suitably qualified and competent person which assesses the likely impact of operational noise emanating from the development on neighbouring properties. The assessment should include but is not limited to the following:

- 1) A description of the proposed development in terms of noise sources and the proposed locations and operating times of the same.
- 2) A detailed plan showing the location of noise sources, noise sensitive premises and survey measurement locations.*
- 3) A description of any noise mitigation methods that will be employed. The effect of mitigation methods on the predicted levels should be reported where appropriate.
- 4) A survey of current ambient (LAeq) and background (LA90) noise levels at appropriate locations neighbouring the proposed site.
- 5) A prediction of noise levels resultant at neighbouring noise sensitive premises, for the operational phase of the proposed development. The raw data and equations used in the calculations should be made available on request.
- 6) An assessment of the predicted noise levels in comparison with relevant standards.*

*Relevant standards and monitoring locations must be agreed beforehand with the Council's Environmental Health Officer.

Noise Impacts – Construction

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. Generally, people are tolerant of construction noise during typical working hours which are taken to be 8am to 7pm Monday to Friday and 8am to 1pm on Saturdays. Works for which noise is inaudible at the curtilage of any noise sensitive property could still be carried out out-with these times.

If the applicant intends to undertake noisy work out-with the aforementioned times, they will be required to submit a detailed construction noise assessment for the written approval of the planning authority. For the avoidance of doubt, this would include any proposal to run compound generators overnight for the purposes of lighting or drying of PPE etc. The assessment should include: -

- 1) A description of construction activities with reference to noise generating plant and equipment.
- 2) A detailed plan showing the location of noise sources, noise sensitive premises and

any survey measurement locations.

3) A description of any noise mitigation methods that will be employed and the predicted effect of said methods on noise levels.

4) A prediction of noise levels resultant at the curtilage of noise sensitive receptors.

5) An assessment of the predicted noise levels in comparison with relevant standards.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. The applicant will be required to submit a scheme demonstrating how this will be implemented.

Dust

Any application should be accompanied by a scheme for the suppression of dust during construction, for the approval of the planning authority.

Pollution Prevention

The application should include a schedule of mitigation and commitment to employ an Ecological Clerk of Works.

Private Water Supplies

Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:

- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. SEPA are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.

SEPA refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice on the minimum information they require to be submitted.

Borrow Pits

Information should be provided on the proposed location, dimensions and restoration proposals for borrow pits.

Workers Camp

Details of the form and location for the accommodation of construction workers would be helpful in the application.

Lighting

Should there be a requirement for external lighting of the proposed development the effects from lighting should be fully considered given the predicted visibility of the proposal from the surrounding area and the high sensitivity of to the effects of lighting. Night time visualisations and the cumulative effects of lighting may also be required in support of a future application.

Transport and Wider Access

Advice from Transport Planning Team

Impact on the Local Road Network

The site appears to be accessed off the C1144 Kinloch Hourn Road. Any application submitted should include an assessment of the route's capability to accommodate the predicted vehicle movements deemed necessary for both the construction and ongoing operation of the proposed new facility.

For the construction phase, the submission should include a breakdown of the anticipated types, quantities and distribution of construction vehicle movements throughout the works, broken down by at least larger goods vehicles (HGV's), abnormal loads (if required) and all other construction-related traffic. With regards to the operational phase, even though Transport Planning assume such traffic levels will be low, this should be quantified for information in any submission made.

Where the route is deemed to require improvements to safely accommodate the predicted traffic impacts, whilst remaining safe for all other road users, the details of such improvements should be included in any submission made, along with justification why they are required and why they should be deemed

acceptable. Any such improvements should aim to comply with the requirements from Transport Planning's published [Roads and Transport Guidelines for New Developments](#).

Any submission should include a Framework Construction Traffic Management Plan (CTMP) that sets out the management measures that will be implemented to assist with safely managing the routing of construction-related traffic to and from this development and help to limit impacts on the public road network. Such management measures will be in addition to any physical improvements deemed necessary. The Framework CTMP should clarify the proposed routing of construction traffic.

The Framework CTMP should also set out any management measures that will be implemented to avoid generating unacceptable construction traffic during sensitive times on the existing local public roads (e.g. during school opening and closing times). Also, any anticipated measures that will restrict or prevent free use of the local public road network during the works should also be clarified (e.g. temporary traffic lights, road closures, speed limits, on-street parking restrictions etc).

Highland Council as the Local Roads Authority will not accept plant or materials being loaded and unloaded on the local public road network. Suitable facilities off the public road should be provided to permit the loading, unloading and storage of plant and materials. Similarly, The Council will not accept construction traffic parking on local public roads during the works. Again, suitable facilities should be provided for all construction traffic to park off the road.

Any submission should confirm commitment to enter into a formal "wear and tear" agreement with Highland Council as the Local Roads Authority, as set out in Section 96 of the Roads (Scotland) Act 1984. This should include a commitment to survey the route prior to works commencing, ideally with a Local Area Roads representative, if available, and then again at the end of the works. Also, the Framework CTMP should set out how the route will be inspected during the works to determine if there has been any damage to it that warrants immediate repair, or any mud or other construction-related materials deposited on it that warrants being removed. Depending on the anticipated scale of impact on the local public road network and its current condition, it may be necessary for The Council to seek a Road Bond or other financial security to protect the Authority from any extraordinary expenses if required to step in and make-good any issues with the local public roads impacted.

Design details for the proposed vehicular access(es) into the site should be included in any submission. These details should justify that the layout of the access(es) will be capable of safely accommodating the vehicle movements needing to use them, both during the construction and its ongoing operation. The design details and construction forms of any accesses should adhere with the requirements from our published [Roads and Transport Guidelines for New Developments](#).

The access(es) should also demonstrate that adequate visibility can be achieved in both directions along the C1144 Kinloch Hourn Road from a 9m setback from the edge of the existing surfaced carriageway of the public road. The required visibility distances will be dependent on the current general traffic speeds along that section of road, Table 5.4 from Transport Planning's published [Roads and Transport Guidelines for New Developments](#).

Any submission should justify that the Promoter either has full control of all the land needed to achieve the required visibility splays, or that they have agreements with the neighbouring landowners impacted. Such agreements should demonstrate that any neighbouring landowners impacted give permission for the visibility splays to run through their land and that they commit to not implementing any construction, planting or landscaping that could impact on the achievement of those required visibility splays going forward.

The designs for the access(es) will also need to demonstrate that it will prevent surface water from the development site running out onto the local public road. Also, any existing roadside ditches impacted by the proposed access works will need to be catered for within the designs. This could involve culverting below the new access(es) or diverting any ditch to avoid it/them.

Any new vehicular access(es) should be surfaced with a suitably bound bituminous material for at least the first 6m from the edge of the existing carriageway of the local public road. Also, any gates should be set sufficiently back so that the vehicles needing access during the operation of this facility can fully leave the carriageway of the public road before reaching the gates.

The internal layout of the development will need to demonstrate that suitable facilities will be provided so that any traffic accessing the site, either during the construction or its ongoing operation, will be able to turn safely. This is to ensure that there should not be any need for vehicles to either reverse into or out of the site from the A839 public road. We could not support such manoeuvres from a road safety perspective.

Similarly, the internal layouts will also need to clarify what the levels of operational parking provision will be within the site. Any submission should justify why those levels will be required and why they should be deemed sufficient for the ongoing operation of this facility.

Advice from Transport Scotland **Impact on the Trunk Road Network**

The proposed development comprises a pumped storage hydro project with a capacity of up to 900MW located at Loch Quoich, approximately 23km west of the A87(T) at Invergarry. Access to the site is identified as via the A82(T)/ A87(T) and the unnamed minor road to Kinlochourn.

Information supporting the preapp indicates that surveys have been carried out to support the preliminary feasibility and planning scoping stages, and these include Transport & Access surveys. Transport Scotland would state that the application will require to be supported by a Transport Assessment report and an Abnormal Load Route Survey. Forecast HGV movements using the trunk road junctions should be explicitly identified, with the impact of both general construction traffic and abnormal loads being quantified and mitigated as appropriate. Transport Scotland would also request that a Construction Traffic Management Plan be submitted.

Advice from Access Officer

Public Access

The Access Officer notes that Policy 77 of the Highland wide Local Development Plan asks that a major development be accompanied by an Outdoor Access Plan or Access Management Plan. Ideally one would be submitted with an application, possibly as an appendix to an EIA. The Access Officer recommends that it address the development's impact on outdoor access in line with the guidelines in NatureScot's Handbook on EIA. Following that guidance will help adequately and comprehensively address this proposal's potential impact on public access during preparatory and construction work along with the proposal's impacts once the scheme is up and running.

The baseline information for public access can be much improved. The Access Officer recommends that Scotways be consulted for a full listing of public rights of way as Scottish Hill Tracks does not cover all the local public rights of way.

The construction of the haul/access road will cut across the path to and from Spidean Mialach, a popular Munro often completed in a round with Gleouraich. Additionally, it will cut across an old stalkers' path and then across the broader, less well-defined line taken to and from Spidean Mialach. This presents several issues:

- How will public access be accommodated along the stalkers' path while building the haul road?
- How will the path be physically incorporated into the construction and crossing of that road and to what standard?
- How will public access be managed where it will cross that haul road further up the hill?
- Once complete how will access be managed along that haul road? For instance, there will be a temptation for some walkers to continue up or down that road during the construction and operational periods. That could lead to conflict with construction traffic and people following the haul road for longer than intended taking them closer to the hill loch or leading them further down the hill, further from their cars and mean more walkers along the public road.

Policy 77 also says that "Where a proposal affects ... an access point to water, or significantly affects wider access rights, then The Council will require it to either:

- retain the existing path or water access point while maintaining or enhancing its amenity value; or
- ensure alternative access provision that is no less attractive, is safe and convenient for public use, and does not damage or disturb species or habitats.

Should this proposal affect access to Loch Quoich during the construction and/or operational phases then mitigation should be built into any proposal at the application stage.

Since this proposal will significantly affect wider access rights the Access Officer recommends that an Access Management Plan includes a Red (Specification) path survey, as defined here [Upland Path Management \(nature.scot\)](#) for the mountain route from the public road up to the high point of the haul/access road, acknowledging that much of the work will be reinstatement of the original route to equivalent modern design and standards. If the public is to be encouraged to follow the stalkers' path across the lower length of haul/access road the pathwork at that point should be completed at the same time as the haul road is built. It should be retained and/or adapted when and if that road is reduced to serve as the permanent access road. The reinstatement of the rest of the original stalkers' path should be completed, to the satisfaction of the Planning Authority before the site comes into operation.

The Access Officer notes that the Cape Wrath Trail Long Distance Route from Barrisdale – Kinloch Hourn – Invershiel is in the wider surrounding area and will be impacted by the proposal.

Water Environment

Advice from Flood Risk Management Team

Flood Risk

Development or landraising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close

proximity to a watercourse, a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere. SEPA's [Technical Flood Risk Guidance for Stakeholders](#) outlines the information required to be submitted as part of a Flood Risk Assessment.

Small watercourse crossings should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200 year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures.

A minimum buffer strip of 6m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted. Where SEPA's Pre Application and other advice requires a greater buffer, this requirement should be observed.

Further advice and SEPA's best practice guidance are available within the water engineering section of SEPA's website <https://www.sepa.org.uk/regulations/water/engineering/>.

Guidance on the design of water crossings can be found in Construction of River Crossings Good Practice Guide <http://www.sepa.org.uk/media/151036/wat-sg-25.pdf>.

Drainage

Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses and waterbodies. A Drainage Impact Assessment (DIA) is required and should ensure that the post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.

Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA. Refer to the Council's Flood Risk and Drainage Impact: Supplementary Guidance for further detailed requirements.

The DIA should include details relating to any existing field drains and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The applicant should demonstrate, within the proposals submitted, any mitigation measures to manage the residual risk of overland flow/pluvial flooding.

Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.

Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA.

Development or landraising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Should any permanent infrastructure be located within close proximity to a watercourse a Flood Risk Assessment should be submitted to demonstrate that the development is not at risk from flooding and will not increase flood risk elsewhere.

A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted. As above, best practice guidance is available within the water engineering section of SEPA's website: <https://www.sepa.org.uk/regulations/water/engineering/> and Construction of River Crossings Good Practice Guide: <http://www.sepa.org.uk/media/151036/wat-sg-25.pdf>.

Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR)

The proposed hydro scheme will require an authorisation from SEPA under CAR. It is likely that the CAR application will be subject to a derogation (exemption under the Water Framework Directive) assessment and third party consultation which could result in amendments to the scheme. SEPA therefore strongly encourage applicants to twin-track applications for consent under planning and CAR to ensure that CAR requirements can be accommodated more easily when proposals are at their most fluid.

Should the applicant choose not to twin-track their applications then the following details must be included in the planning submission to allow us to provide an indication of the potential consentability of the proposal under CAR:

- a) The location and design of the intakes and outfalls and their impact upon the morphology of the water environment.
- b) Compensation flow.
- c) Fish passages.
- d) Other relevant CAR or planning applications or consents for abstractions/hydro schemes.
- e) Sensitive water uses, water dependent species (including bryophytes) and ecosystems.

See Planning guidance on hydropower developments to assist in meeting these information requirements. More detailed guidance on CAR can be found on SEPA's hydropower web page.

Other Impacts on the Water Environment

Other elements of the scheme must be designed to avoid impacts upon the water environment. For example, the route of track to the impoundment should be shortened, if possible. If this is not possible due to slope the finalised route should nonetheless include a buffer of at least 50m between the top of the banks of any watercourse gorge/V-valley and any construction works,

Where activities such as watercourse crossings are proposed they should follow recognised best practice guidance. Small crossings should be oversized bottomless culverts and larger crossings should be single span bridges demonstrated to convey the 1 in 200 year flood event including an allowance for flood risk.

Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses and waterbodies. The Drainage Impact Assessment should ensure that post development runoff rate is no greater than pre-development runoff rate (i.e. greenfield runoff) for all return periods up to the 1 in 200 year event including an allowance for climate change.

Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA. As above, the Council's Flood Risk and Drainage Impact: Supplementary Guidance should be referred to for further detailed requirements.

Ground Water Dependant Terrestrial Ecosystems

GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:

- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

Please refer to Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems for further advice and the minimum information we require to be submitted.

Built and Cultural Heritage

Advice from Historic Environment Scotland

Historic Environment Scotland have no comments to make on this application regarding historic environment interests at the national level.

Advice from Historic Environment Team

There are no recorded historic environment assets within the boundary of the proposed development and the potential for the presence and survival of unrecorded remains is considered to be low. In this case, there is no specific mitigation in regard to the historic environment that would be required in advance of development within this boundary.

Developer Contributions

The Council's [Developer Contributions Supplementary Guidance](#) will be used in the determination of planning applications and requires all development, including single house developments, make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. For the proposed development, the anticipated developer

contribution requirements are outlined below. Please note that requirements can change over time and the exact amount payable will be confirmed at the point that a planning application is determined.

Planning obligations seek to mitigate the impact of any development which cannot be mitigated through the planning process or through planning conditions. Any planning obligations sought must accord with Scottish Government Planning Circular 3/2012 (Planning Obligations and Good Neighbour Agreements).

Industrial (including energy) developments are exempt from education, community facilities and affordable housing contributions. However, contributions towards Transport (including Active Travel), Green Infrastructure, Water & Waste and Public Art/Realm contributions in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018) would still be required. Full consideration of which would be undertaken as part of the detailed proposal.

The following developer contributions and/or onsite provision are likely to be required:

- Transport infrastructure improvements as the proposal will result in additional HGV and car trips to the proposed site;
- On site green infrastructure, this should include appropriate measures to conserve, restore and enhance biodiversity.

Community Benefit

Whilst Community Benefit is a separate issue to planning, the Council wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. The Council's [Community Benefit policy](#) contains contacts for any further discussion on this.

Community wealth building

NPF4 seeks to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. The outcome for this policy is for:

- local economic development that focuses on community and place benefits as a central and primary consideration - support local employment and supply chains.
- support community ownership and management of buildings and land.

Policy 25 of NPF4 states that

- a) Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms and enabling community led ownership of buildings and assets.
- b) Development proposals linked to community ownership and management of land will be supported.

Going forward the Council will be looking to secure direct benefits to communities for renewable development and it is likely that a Council strategy to deliver this will be initiated in due course.

Pre-Application Procedures

Proposal of Application Notice

The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008 require that for any major development pre-application consultation must be undertaken. This requires a formal Proposal of Application Notice to be submitted to the Planning Authority at least 12 weeks prior to any formal planning application being lodged and any subsequent planning application must be accompanied by a Pre-application Community Consultation report. Further information is provided on the Council website, please see the Proposal of Application Notice section [here](#)

Public Consultation

Public consultation should be undertaken as the proposals develop to help both gauging the opinion of the local community and also scoping potential areas of conflict which could be addressed prior to submission of the application.

When carrying out community consultation we recommend that full consideration is taken of Scottish Government Planning Advice Note 3/2010 - Community Engagement. This includes the standards for community involvement which should be adhered to. These standards are:

- Involvement

- Support
- Planning
- Methods
- Working together
- Sharing information
- Working with others
- Improvement
- Feedback
- Monitoring and evaluation

It is advisable to take into consideration all of the comments made by members of the public before a planning application is submitted to ensure that the public feel they have had an influence over the proposals. For public consultation it may be useful to use the SP=EED tool developed by Planning Aid Scotland. This builds on the Standards for Community Engagement set out in PAN 3/2010. This is available online at <https://www.pas.org.uk/>.

Environmental Impact Assessment Screening

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2011 requires the proposal be screened to determine whether an Environmental Impact Assessment (EIA) is required to support a planning application. This proposal is therefore required to be screened. A formal request for a Screening Opinion/s should be made in writing to the Planning Authority. An EIA Screening Opinion form can be downloaded from the Council's website [here](#). At present it is not possible to do this online.

Community Councils

In terms of the appropriate Community Councils to consult, the proposal is located within the Glengarry Community Council area. A development of the nature proposed may affect a number of adjacent Community Councils, as such it is recommended that adjacent Community Councils are also consulted. The Ward Manager Dot Ferguson can provide advice further in this regard if required. Contact details for all community Councils can be found [here](#).

Access

It would be beneficial to at this stage consult with the local Disability Access Panel. The contact details for your local panel are:

- Lochaber Disability Access Panel, Voluntary Action Lochaber, Claggan Road, Fort William, PH33 6PH. Telephone: (01397) 706044.

For general advice in relation to the removal of barriers and the promotion of equal access for all people affected by disability for your development contact the [Scottish Disability Equality Forum](#), 12 Enterprise House, Springkerse Business Park, Stirling, FK7 7UF. Telephone: (01786) 446456.

Application Procedures

Design Workshop

This looks at matters of Landscape and Visual Impact in more detail. This is a solutions based workshop and it is best undertaken when (or just before) you reach design stage. We will spend up to 2 hours with you. Utilising wirelines and, where appropriate, photomontages prepared by your landscape consultants we will consider what the key design viewpoints are, whether it meets with the design rationale for development in the area and what if any further design changes are potentially required. The fee for this service can be found at [Planning and building standards fees | Planning and building standards fees | The Highland Council](#).

Priority Determination

Service Further to our discussions, the Council offer a Priority Determination Service. We enter specific processing agreements and guarantee determination timescales with the applicant on the basis of the following:

- all information is provided to our relevant standards/guidance.
- Our pre-application advice service is used to discuss the pertinent matters related to the determination of the application;
- engagement with consultees is held following receipt of the pre-application advice to ensure that the matters raised have been satisfactorily addressed; and
- use of our design workshop service;

- a gatecheck is undertaken prior to submission of the application. This would be based upon the preapplication advice received and any further requirements set out in the Scoping response.

The guaranteed date is subject to agreement and no fundamental matters being raised through consultation responses/public comments. It is important to note that this service is related to determination of the application and does not pre-judge the response / decision of the Planning Authority.

Processing Agreements

A processing agreement is a way of helping developers, the Council and relevant stakeholders work together through the planning process. It involves setting out the key stages involved in deciding a planning application, identifying what information is required from whom and setting time scales for the various stages of the process.

The Council actively encourages the use of processing agreements for major applications. You are advised to contact the Council's Major Application Team with a view to agreeing a Processing Agreement at the earliest possible opportunity. Contact details are provided in section 18 towards the end of this pack.

Satisfaction of Conditions

We also have our Satisfaction of Conditions Service where we work with you post consent to satisfy conditions based on similar principles to our Priority Determination Service. Information on that is available on our website: [Satisfaction and discharge of conditions | Major Developments | The Highland Council](#).

Councillors Code of Conduct

It would be beneficial for you to be familiar with the Councillors' Code of Conduct. This is available online at the Standards Commission for Scotland [website](#).

Scheme of Delegation

All applications will be determined in line with the Council's Scheme of Delegation. It would be beneficial for you to familiarise yourself with the scheme. This is available [online](#).

Any Other Appropriate Information

Gaelic

In line with the Council's ongoing commitment to promote the increased use of Gaelic in developments within the Highlands, you are encouraged to consider the use of bilingual signs - both internal and external - as part of your proposal. Our Gaelic Translation Officers are able to provide additional advice and help with translations, if required.

For further information and guidance, please contact gaelic@highland.gov.uk

To download a copy of the Council's 'Using Gaelic in Signs' advice note, please visit:

https://www.highland.gov.uk/downloads/file/11857/guidelines_on_the_use_of_gaelic_in_highland_council_services

For details on grant funding for bilingual signage, please contact Comunn na Gàidhlig on (01463) 724287 or visit www.cnaq.org.

Contacts

Roddy Dowell - Case Officer	rodgy.dowell@highland.gov.uk
David Mudie - Area Planning Manager South	david.mudie@highland.gov.uk
Contaminated Land - Nicola MacKenzie	nicola.mackenzie@highland.gov.uk
Transport Planning – Fiona Nairn	fiona.nairn@highland.gov.uk
Transport Scotland	Gerard.mcphilips@transport.gov.scot
Flood Risk Management Team – Blair Duncan	blair.duncan@highland.gov.uk
Historic Environment Team – Kirsty Cameron	kirsty.cameron@highland.gov.uk
Development Plans – Julie - Ann Bain	lulie-ann.bain@highland.gov.uk
Ecology Officer – Karen Couper	karen.couper@highland.gov.uk
Access Officer – Stewart Eastaugh	stewart.eastaugh@highland.gov.uk
Historic Environment Scotland - Urszula Szupczynska	urszula.szupczynska@hes.scot
NatureScot – Corrina Mertens	corrina.mertens@nature.scot
Scottish Environmental Protection Agency – Susan Haslam	Planning.north@sepa.org.uk

Disclaimer

This advice is based on the information submitted and is given without prejudice to the future consideration of and decision on any application received by The Highland Council.

Pre-application case files are not publicly available but can be the subject of Freedom of Information and Environmental Information Regulations requests.

Useful Weblinks

The Highland Council Development Plans

https://www.highland.gov.uk/info/178/local_and_statutory_development_plans

Highland Council Supplementary and Development Guidance Listed by Category:

https://www.highland.gov.uk/directory/52/development_guidance

Siting and Design Quality:

THC Sustainable Design Guide

https://www.highland.gov.uk/directory_record/683409/sustainable_design

Roads/Access and Transport

More information on access and parking standards (incl. small housing developments) can be found at:

https://www.highland.gov.uk/info/20005/roads_and_pavements/101/permits_for_working_on_public_roads/4

Access Panel

The Council encourages applicants at pre-application stage to engage with the local Disability Access Panel to consider accessibility improvements for physically disabled and sensory impaired people. The Highland Council have published a [Planning Protocol for Effective Engagement with Access Panels](#), which you should take into consideration

Access Panels Contact Info-

https://www.highland.gov.uk/info/751/equality_diversity_and_citizenship/326/equality_and_diversity_contacts/4

Scottish Government

Scottish Government Building, Planning and Design Pages

<https://www.gov.scot/building-planning-and-design/>

Scottish Government Planning and Architecture Guidance

<https://www.gov.scot/policies/planning-architecture/planning-guidance/>

Scottish Planning Policy

<https://www.gov.scot/publications/scottish-planning-policy/>

Scottish Water

Contact Scottish Water for guidance on connections to the public water/drainage network:

<https://www.scottishwater.co.uk/en/Business-and-Developers/Connecting-to-Our-Network/Pre-Development-Information/Planning-Your-Development>

SEPA

You can find more information on SUDS at: <https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-urban-environment/>

You can view SEPA's small-scale developments guidance here:

<https://www.sepa.org.uk/regulations/water/small-scale-sewage-discharges/>

You can view SEPA's flood risk map here: <https://www.sepa.org.uk/environment/water/flooding/flood-maps/>

CAR Licensing - https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

Historic Environment

The Highland Historic Environment Record (HER) contains detailed information about listed buildings, conservation areas and archaeological sites in the Highland area:

<http://her.highland.gov.uk>

General advice on development affecting historic designations can be found at:

<https://www.historicenvironment.scot/advice-and-support/>

Protected Species -SNH

More information on Scotland's protected species and areas can be found at:

<https://www.nature.scot/professional-advice/safeguarding-protected-areas-and-species/protected-species>

<https://www.nature.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers/planning-and-development-protected-areas>

Trees and Woodland

The Scottish Government's woodland strategy and associated policies can be found here:

<https://forestry.gov.scot/support-regulations/control-of-woodland-removal>

The Council's guidance on tree/woodland issues can be found here:

http://www.highland.gov.uk/info/1225/countryside_farming_and_wildlife/63/trees_and_forestry/