

FEARNA STORAGE

Fearna Pumped Storage Hydro Scheme EIA Report

Appendix 4.5 – Gate Check Report

February 2025



Quality Information

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Fearna Pumped Storage Hydro Scheme

Gate Check 1 Report

January 2025

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1. Introduction

This Gate Check Report has been prepared by Gilkes Energy Ltd (GEL) on behalf of Fearna PSH Ltd. ("the Applicant"). This report is submitted to the Energy Consents Unit (ECU) of the Scottish Government in advance of an application to the Scottish Ministers under Section 36 of The Electricity Act 1989 for consent to build and operate a new pumped storage scheme with an installed capacity of up to 1,800 MW.

Purpose of Gate Check 1

The purpose of this Gate Check Report is to satisfy the requirements of the gate checking procedures for Applications under Section 36 of The Electricity Act 1989.

This gate check 1 sets out how the Scottish Ministers' and consultee comments provided in the scoping opinion are to be addressed by the Applicant and taken forward in the EIA report.

This Gate Check 1 Report is structured as follows:

- Description of the Proposed Development;
- Evolution of the design;
- Consultation with statutory and non-statutory consultees;
- Consultation with the local community;
- A table summarising how the Applicant has addressed or proposes to address the key matters raised in the scoping opinion and subsequent consultation is provided in **Appendix 1 – Scoping Response Matrix**; and
- The timeline for submission of the Section 36 application with anticipated dates for adverts, consultees lists, and proposed locations of the EIA report for public viewing.

2. The Proposed Development

The function of the Proposed Development would be to create a large-scale long duration electricity storage scheme with up to 1800MW generation capacity to store and release energy to or from the electricity transmission system, to help balance supply and demand for power at a national scale.

The layout of the Proposed Development is shown in **Figure 2.1 – Location Plan** and **Figure 2.2 – Scheme Layout**. The Proposed Development would operate by transferring water between a lower reservoir, the existing Quoich reservoir, and an upper reservoir created by raising the natural level of Loch Fearna. The reservoirs would be connected by a system of underground waterways, with an underground powerhouse by the shore of the Quoich reservoir. The principal components of the Proposed Development would be:

- Loch Fearna – the upper reservoir;
- The underground waterway system;
- Loch Quoich – the lower reservoir;
- The powerhouse and switchyard;
- Access tracks and footpaths; and
- Temporary construction facilities and borrow pits.

The Proposed Development is described in more detail in **Appendix 2 - The Proposed Development**.

The Proposed Development would include a significant package of habitat compensation and enhancement works. These proposals would demonstrably and significantly contribute to the enhancement of biodiversity, including restoring degraded habitats and building and strengthening nature networks and the connections between them.

3. Design Evolution

The key principles on which the design of the Proposed Development is founded are as follows:

- Sizing the capacity of the scheme to maximise the opportunity of the site for the purpose of long term electricity storage;
- Design and location of the scheme components to minimise any impacts of the Proposed Development on the natural environment;
- Planning the construction and operation of the Proposed Development to minimise any negative effects on users of the site and communities local to and more distant from the site;
- Carefully designing and locating permanent above-ground features to minimise landscape and visual effect and to optimise the opportunity for mitigation measures;
- Sizing and designing the scheme components to adequately meet their functional requirements within the minimum design footprint;
- Optimising constructability and minimising the construction programme duration which would minimise local disruption;
- Designing the mass balance and spoil management of materials within the site such that wherever possible construction materials are won from within the site and materials displaced by the construction are put to beneficial use within the site;
- Prioritising sustainable construction principles; and
- The safe construction, operation and decommissioning of the Proposed Development.

The proposed Development scores highly against the above criteria when compared with other potential Pumped Storage Hydro (PSH) sites. The key principles being the ability to build a technically feasible large capacity store of potential electrical energy, close to the main grid network with a relatively modest footprint on existing habitats, away from designated natural protection sites and relatively limited visual and other local impacts.

There have been two key drivers shaping the evolution of the design since receipt of the Scoping Opinion:

- Design changes driven by the results of the environmental surveys, principally changes to minimise the impacts on more sensitive habitats; and
- Design changes driven by feedback from statutory and non-statutory consultees.

The evolution of the design is detailed in the table below.

Design Change	Reason for Design Change
Generation capacity reduced from 'up to 2000MW' to 'up to 1800MW'	National Grid regulatory conditions restrict the maximum generation at a single plant to 1800MW. The project economics at 2000MW were also slightly negative in comparison to 1800MW.
Fearna Dam alignment changed from straight-edged to curved and moving the dam upstream	Amending the shape of the Fearna dam has reduced the visual impact by avoiding sharp edges on the downstream face of the dam. Moving the dam upstream behind the existing landform has also reduced the visual impact, volume of material required and improved dam stability.
Coire Dubh dam alignment amended	Amendment to the Coire Dubh dam alignment to reduce peat excavation and material quantities.
Position of proposed temporary construction compound SC1 moved to an alternative position on the Southern Access Route	Following environmental surveys and engagement with the landowner and stakeholders on environmental constraints, SC1 was moved to an alternative position which is currently felled commercial timber and has no significant environmental constraints, less peat cover and is immediately adjacent to the Southern Access Route.
Switchyard area adjacent to the powerhouse increased in size	Following engineering input from the Transmisison Owner, their minimum spatial requirements for the proposed switchyard were defined. The area within the disused quarry has been increased accordingly and will be built from excavated material from the adjacent powerhouse excavations and tunnel material.
Access track alignments optimised	To minimise earthworks, visual and environmental impacts.
Number of pressure tunnels and inlet structures reduced from 3 to 2	The 1800MW scheme requires two pressure tunnels rather than three, so one tunnel and inlet structure has been removed.
Powerhouse and switchyard building arrangement	Refinement of the building elevations, roof and surrounding landscaping by the appointed architect and landscape architect to develop architectural arrangements in keeping with the surrounding landscape and land use.
Powerhouse and switchyard area landscape architecture developed	Additional landforms have been created around the powerhouse and switchyard area to reflect the surrounding landscape and screen the lower works from the public. Areas of planting have been also

Design Change	Reason for Design Change
	been added. The design of the shoreline along Loch Quoich now includes vegetated rock armour which provides softer landscaping and promotes ecology.

4. Consultation with Statutory and Non-statutory Consultees

Pre-application Stage

A Pre-Application Meeting was held with THC on 10th May 2023 to discuss the Proposed Development, providing the Applicant an opportunity to present the proposals and seek advice on the acceptability of the project, and likely requirements and expectations for a future application.

Following this meeting, THC provided a formal pre-application report on 7th June 2023, detailing their understanding of the project, and setting out relevant planning policy and environmental and other considerations that would need to be addressed as part of the application supporting documents.

Scoping Stage

A virtual Pre-application Meeting was held with the Energy Consents Unit of the Scottish Government (ECU) on 2nd May 2023.

A formal request for a Scoping Opinion was made to the Scottish Ministers under Regulation 12 of the EIA Regulations on 23 February 2024. This was accompanied by a Scoping Report which sought input from statutory and non-statutory consultees regarding the information to be provided within an EIA Report to accompany a section 36 application under the Electricity Act 1989.

The Scottish Ministers issued a Scoping Opinion on 3 July 2024, which has been used to guide the EIA process. A matrix detailing the issues that were raised throughout the scoping stage is included in **Appendix 1 – Scoping Response Matrix**.

Post Scoping Consultation

The following provides details of the statutory and non-statutory consultees that have been consulted since the formal Pre-application Report and subsequent Scoping Opinion response was issued.

Site Visits

- RSPB Scotland (1st May 2024)
- NDSFB (1st May 2024)
- ECU (10th June 2024)
- Mountaineering Scotland (24th June 2024)
- THC Access Officer (24th June 2024)
- FLS (Spring 2024)

Meetings and Correspondence

Correspondence, telephone calls and Teams meetings has also taken place with the following consultees:

- THC (fortnightly Teams calls with the planning officer, and correspondence with various technical departments);
- NatureScot;
- SEPA Licencing;
- SEPA Planning;
- The Ness District Salmon Fishery Board;
- The John Muir Trust;
- Mountaineering Scotland;
- Transport Scotland;
- RSPB Scotland;
- The Highland Raptor Survey Group;
- Forestry and Land Scotland;
- Buglife Scotland.

Consultation with these parties will be detailed in the EIA Report for the Proposed Development.

5. Consultation with the Local Community and Elected Representatives

The following list provides a chronological summary of the key consultation with the local community and elected representatives:

- Local councillors Andrew Baldrey, Liz Saggars and John Grafton emailed on 30th November 2023 to inform them of the project.
- Meeting between Fraser Allison and Ian Blackford MP on 30th November 2023 at which details of the project were discussed.
- A public exhibition event was held in Glengarry Community Hall on 6th December 2023 between 12 noon and 7pm.
- On 22nd March 2024, the project website, which includes details of the Applicant and the Proposed Development, went live. The website has a facility to contact the Applicant with any questions or comments.
- A project update was issued by email to the Invergarry Community Council and local residents distribution list by email on 13th May 2024.
- An in-person update was provided to the Glengarry Community Council on 12th August 2023. THC councillors Liz Saggars and Andrew Baldrey were present at the meeting.
- A public exhibition event was held in Glengarry Community Hall on 10th December 2024 between 12 noon and 7pm.

Full details of these will be included in the Pre-application Consultation Report (PAC) to be submitted with the S36 application.

- The Proposal of Application Notice (PAN) was submitted to THC on 4th December 2024, copied to the Glengarry Community Council, the local councillors, and the MSPs and MP for the constituencies within which the Proposed Development is located.

6. Timeline and Process for Submission of the Section 36 Application

Timeline

It is proposed to submit a Section 36 application for the Proposed Development in March 2025.

Advertisement

In accordance with Regulation 4 of the Electricity (Applications for Consent) regulations 1990, and Regulation 14 of the EIA Regulations, the application will be advertised in the Edinburgh Gazette, a national newspaper, and a local newspaper (to be agreed in consultation with ECU). It is proposed to advertise the application in The Herald, the Edinburgh Gazette, and the Lochaber Times.

In agreement with the ECU, the advert will describe the application, state where hard copies of the EIA Report are located, state a date by which any persons can make representations to the Scottish Ministers in relation to the application, and the address to where representations are to be sent.

Public Viewing of the EIA report

In accordance with Regulation 18 of the EIA regulations, copies of the EIA report will be available to view on the application website at: <https://www.fearnastorage.co.uk>

Hard copies of the EIA Report will also be available to view at the following locations (to be agreed with the ECU):

- Local Highland Council Offices (locations to be agreed with ECU); and
- The Glengarry Community Hall

Additional copies will be made available subject to a reasonable fee on request.

Consultee List

The list of consultees to be sent a copy of the submitted EIA Report will be agreed with the ECU. It is anticipated to include those consultees consulted during the scoping process, and any other stakeholders the Applicant or ECU are aware of with a potential interest in the project or its potential effects, as noted in the table below:

Statutory Consultees
Highland Council
SEPA
NatureScot
Historic Environment Scotland
Internal Scottish Government Advisors
Transport Scotland
Scottish Forestry

Non-Statutory Consultees
British Horse Society Scotland
BT
Buglife
Civil Aviation Authority - Airspace
Crown Estate Scotland
Defence Infrastructure Organisation
Forestry and Land Scotland
Glen Garry Community Council
Highland and Islands Airports
Joint Radio Company
John Muir Trust
Mountaineering Scotland
NATS Safeguarding
Ness District Salmon Fishery Board
Paddle Scotland
RSPB Scotland
Scottish Canals
Scottish Rights of Way and Access Society (ScotWays)
Scottish Water
Scottish Wildlife Trust
Scottish Wild Land Group (SWLG)
Visit Scotland

Fearna Pumped Storage Scheme

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Appendix 1 - Scoping Response Matrix

The Scottish Government	Abbreviation	Page
Energy Consents Unit	ECU	2
Statutory Consultees		
Highland Council	THC	4
SEPA	SEPA	26
SNH	NS	30
Historic Environment Scotland	HES	34
Internal Scottish Government Advisors		
Transport Scotland	TS	34
Scottish Forestry	SF	36
Non Statutory Consultees		
BT	BT	37
Defence Infrastructure Organisation	MOD	37
Crown Estate Scotland	CES	38
Ness District Salmon Fishery Board	NDSFB	38
Mountaineering Scotland	MountScot	43
NATS Safeguarding	NATS	44
RSPB Scotland	RSPB	44
Scottish Rights of Way Society (Scotways)	SWRAS	51
Scottish Water	SW	51
Scottish Canals	SC	52
Glen Garry Community Council	GGCC	53
Buglife	BUG	60

Ref	Subject	Consultee Comment	Response / Comments
ECU-01	Confirm presence of Scottish Water assets	Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there any Scottish Water assets which may be affected by the development and includes details in the EIA report of any relevant mitigation measures to be provided.	Assessments of potential impacts on the water environment, including Scottish Water assets and Drinking Water Protected Areas, is assessed in this Chapter. Confirmatory water quality monitoring is proposed prior to, during and following construction (should planning permission be granted).
ECU-02	Private drinking water supplies	Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.	Private water supplies have been investigated and a Private Water Supply Risk Assessment carried out. This is include in the EIA Report in Chapter 12 – Geology , Soils and Water.
ECU-03	PLHRA	Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	A site specific PLHRA is presented in the EIAR as Appendix 12.1 - PLHRA . This has been informed by a comprehensive peat probing campaign, geomorphological mapping and analysis of slopes, and peat characteristics are required by best practice.
ECU-04	Visualisation locations	The scoping report identified viewpoints for visualisations at Figure 5.1 to be assessed within the landscape and visual impact assessment.	Noted. These and additional visualisations requested by consultees have been included in the EIAR at Chapter 7 – Landscape and Visual.
ECU-05	Impact on existing or proposed infrastructure	The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:- • a licenced explosives site; • gas (or any other) pipeline; • existing overhead electric lines; • underground cables; • water pipes; • telecommunications links.	An assessment of these infrastructure assets, whether existing or proposed, has been carried out. Only existing and proposed overhead lines and telecommunications links would be affected. The impact on these has been assessed in consultation with the relevant infrastructure owners and is assessed in the EIAR at Chapter 13 – Land Use.
ECU-06	Flammable, toxic or explosive chemicals on site	Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.	This is addressed in the EIAR Chapter 2 – The Proposed Development at para 2.12.11.

Ref	Subject	Consultee Comment	Response / Comments
ECU-07	Ongoing communication with the ECU	Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.	Noted.
ECU-08	Presentation of mitigation measures	The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.	Each chapter I the EIA Report includes a section on mitigation, and all mitigations are provided in a tabular form in Chapter 19 – Mitigation Schedule of the EIA Report.
ECU-09	Further information for EIA Report	This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 36 consent for the proposed development.	Noted.
ECU-10	Possible requirement for additional information	This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.	Noted.
ECU-11	Shelf life for Scoping Opinion	Without prejudice to that generality (ECU-10), it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.	Noted. It is planned that this period will not be exceeded.
ECU-12	Consultation and communication regarding design refinement during EIA process	It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required and would request that they are kept informed of on-going discussions in relation to this.	Ongoing consultation has taken place between the Developer and relevant parties, including the ECU, as the design has been refined in response to the results of environmental and other surveys. Design development between the submission of the Scoping Report and the submission of the Section 36 Planning Application is included in the EIA Report Chapter 3 – Consideration of Alternatives and Design Evolution .
ECU-13	Gate Check requirement	When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.	That is this document.
ECU-14	10MB file size limit	It should be noted that to facilitate uploading to the Scottish Government Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).	Noted.

Ref	Subject	Consultee Comment	Response / Comments
THC-01	Consider advice from Pre-application advice pack	The Scoping response supplements advice previously given to the applicant in the Pre-Application Advice Pack 23/01810/PREMAJ issued on 7 June 2023. That response should be considered alongside this Scoping response to help inform the content of the forthcoming EIAR.	This has been done. The EIA Report document Appendix 4.4 – Pre-application Advice Response Matrix records how this advice has been responded to in the EIA Report.
THC-02	Description of the development	The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR must include: · a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e., connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied; · a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used; · the risk of accidents, having regard in particular to substances or technologies used; · an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development; and, · the estimated cumulative impact of the project with other consented or operational developments.	As requested, a plan has been provided with the EIAR as Figure 1.1 - Scheme Arrangement with Grid References . The physical characteristics of the development, the materials used, the risk of accidents, the anticipated residues and the cumulative impact of the Proposed Development are included in the various technical chapters of the EIA Report.
THC-03	Alternatives	A statement is required that outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following: · the design chapter should clearly set out the design evolution of the scheme including constraints to the delivery of that scheme; · the range of technologies that may have been considered; · locational criteria and economic parameters used in the initial site selection; · options for access; · design and locational options for all elements of the proposed development (including grid connection); and, · the environmental effects of the different options examined. The assessment should also highlight sustainable development attributes including, for example, an assessment of carbon emissions / carbon savings.	This is addressed in the EIA Report Chapter 3 - Consideration of Alternatives and Design Evolution .
THC-04	Environmental elements affected	The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area, and you are encouraged to use your understanding of these in assessing your development and the potential for cumulative effects to arise. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.	Each chapter of the EIAR has addressed the cumulative impact of the project with other consented or operational projects.
THC-05	Land use and policy	The EIAR should recognise the existing land uses affected by the development having particular regard for THC's Development Plan inclusive of all statutorily adopted Supplementary Guidance (SG). This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and	Existing land uses affected by the development have been covered in the EIAR Chapter 13 - Land Use . Chapter 5 covers Planning Policy Context, which is also be covered in individual chapters as appropriate. Furthermore, a

Ref	Subject	Consultee Comment	Response / Comments
		guidance on renewable energy should be considered in this section. The purpose of this chapter is to highlight relevant policies, not to assess the compatibility of the proposal with policy.	Planning Statement has been provided to accompany the S36 application.
THC-06	Planning policies	It is noted that this proposal has already been submitted for major pre-application advice. The current Development Plan comprises the: • National Planning Framework 4(NPF4) adopted in 2023; • Highland-wide Local Development Plan (HwLDP) adopted 2012; • West Highland and Islands Local Development Plan (WestPlan) adopted 2019. A range of policies will apply to this scheme from all these plans and guidance. The scope of an EIA should address all the relevant issues covered in NPF4, HwLDP and the SG. WestPlan has limited relevance to this type of proposal as their focus is mainly on regional and settlement strategies and identifying specific site allocations for 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 current THC development plan has been discussed in the EIAR Chapter 5 - Planning Policy Context , within the technical chapters where appropriate, and in the Planning Statement which has been provided to accompany the S36 application.
THC-07	National Planning Framework 4	Pumped hydro storage is classed as a national development (number 2 in NPF4) and aims to extend hydroelectricity capacity to support the transition away from fossil fuels, whilst also providing employment opportunities in rural areas. If this proposal proceeds to application stage it will therefore be considered as a national development. However, please note that whilst national development status provides in principle support, it does not grant planning permission and all relevant consents are required. The most relevant NPF4 Policies to this proposal include the following list, for more details please refer to the fuller response in this proposal's pre-application advice 23/01810/PREMAJ: • Policy 1 (Tackling the climate and nature crises) • Policy 2 (Climate mitigation and adaptation) • Policy 3 (Biodiversity) • Policy 4 (Natural Places) • Policy 5 (Soils) • Policy 6 (Forestry, woodland and trees) • Policy 7 (Historic assets and places) • Policy 11 (Energy) • Policy 12 (Zero waste) • Policy 13 (Sustainable transport) • Policy 14 (Design, quality and place) • Policy 18 (Infrastructure first) • Policy 20 (Blue and green infrastructure) • Policy 22 (Flood risk and water management) • Policy 23 (Health and safety) • Policy 25 (Community wealth building) • Policy 26 (Business and industry) • Policy 29 (Rural development) • Policy 33 (Minerals)	NPF4 is discussed in the EIAR Chapter 5 - Planning Policy Context , within the technical chapters where appropriate, and in the Planning Statement which has been provided to accompany the S36 application.

Ref	Subject	Consultee Comment	Response / Comments
THC-08	Highland-wide Local Development Plan	We welcome the reference to the HwLDP in the scoping report. The HwLDP sets out a range of planning policies applicable for the whole Highland Council area. The HwLDP continues to be used alongside NPF4, until it is replaced by a new style LDP. The Council notes that legislation indicates that if there is incompatibility between a provision of the LDP and a provision of the NPF, whichever is the more recently dated shall prevail. This 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. For more details, please refer to the fuller response in this proposal's pre-application advice 23/01810/PREMAJ: • Policy 28 (Sustainable Design) • Policy 30 (Physical Constraints) • Policy 31 (Developer Contributions) • Policy 36 (Wider Countryside) • Policy 51 (Trees and Development) • Policy 53 (Minerals) • Policy 55 (Peat and Soils) • Policy 56 (Travel) • Policy 57 (Natural, Built and Cultural Heritage) • Policy 58 (Protected Species) • Policy 59 (Other Important Species) • Policy 60 (Other Important Habitats) • Policy 61 (Landscape) • Policy 63 (Water Environment) • Policy 64 (Flood Risk) • Policy 65 (Wastewater Treatment) • Policy 66 (Surface Water Drainage) • Policy 67 (Renewable Energy Developments) • Policy 69 (Electricity Transmission Infrastructure) • Policy 77 (Public Access) • Policy 78 (Long Distance Routes)	The Highland-wide Local Development Plan is discussed in the EIAR Chapter 5 - Planning Policy Context , within the technical chapters where appropriate, and in the Planning Statement which has been provided to accompany the S36 application.
THC-09	West Highland and Islands Local Development Plan	We welcome the reference in the Scoping Report to the area local development plan covering this proposal, which is the West Highland and Islands Local Development Plan (WestPlan). WestPlan's focus on regional and settlement strategies and identification of specific site allocations, may highlight priorities for the local area that should be taken into consideration when designing the development, or help to inform plans for community engagement and/or community benefit. For more details, please refer to the fuller response in this proposal's pre-application advice 23/01810/PREMAJ.	The West Highland and Islands Local Development Plan is discussed in the EIAR Chapter 5 - Planning Policy Context , within the technical chapters where appropriate, and in the Planning Statement which has been provided to accompany the S36 application.
THC-10	Sustainability	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. Pumped hydro storage produce a sustainable form of energy, however, the Council will need to be satisfied in reaching a conclusion on any consultation or application that the development in its entirety is in fact sustainable development. In order for us to do so we recommend that matters related to the three pillars of sustainable development are fully assessed in the information that supports the application. The wind farm needs to be considering the provision of energy systems within the holistic demand cycle of the network. The developer needs to consider the impact of the installation and the prospective long-term	A Sustainable Design Statement addressing these points as requested has been provided in the EIA Report at Appendix 2.1 – Sustainable Design Statement .

Ref	Subject	Consultee Comment	Response / Comments
		use of the energy to accommodate the requirements of a decarbonised energy provision for Scotland and the Highlands. The application should include a statement on how the development is likely to contribute to the Scottish Government Energy Efficient Scotland roadmap and provide the Highlands with secure and clean electricity supplies.	
THC-11	Generation of alternative fuels	The developer should also consider the potential for generation of alternative fuels as part of the development. Consideration should be given to an element of local use of the energy and particular use of Hydrogen generation if there is an opportunity in the development for redundancy supply profiles.	The purpose of the Proposed Development is for Long Duration Electricity Storage, and not primarily for renewable energy generation. Its use for hydrogen generation is therefore not appropriate.
TCH-12	Electric car charging strategy	The Council also 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.	This provision has been included and is described in the EIAR Chapter 2 - The Proposed Development .
THC-13	L&V - cumulative impacts	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 2022) and the Highland wind turbine map (last updated January 2024).	Visualisations in panoramic and single frame format have been produced in accordance with the THC Visualisation Standards and have been included in Volume 3b of the EIA Report.
THC-14	L&V - OWESG	The Onshore Wind Energy Supplementary Guidance, on pages 19 and 20, lists ten landscape and visual criteria that the Council use as a framework for assessing proposals. In considering landscape and visual impacts, the assessment should pay particular attention to these 10 criteria, as these will be used in the future appraisal of an application for this proposal and should therefore also form part of the applicant's own assessment.	A review of the Proposed Development against the criteria outlined in the Onshore Wind Energy Supplementary Guidance has been undertaken and is provided in Appendix 7.6 of the EIA Report.
THC-15	L&V - Moidart, Morar and Glen Shiel SLA	The Council has also produced citations for Special Landscape Areas (SLAs) which summarise key characteristics, qualities, sensitivities, and measures for enhancement and must be used to assess the potential impacts of the proposed development. The proposal must have regard to the Moidart, Morar and Glen Shiel SLA.	This is addressed in the EIA Report at Chapter 7 – Landscape and Visual .
THC-16	L&V - methodology requirements	The Council expects the EIAR to consider the landscape and visual impact of the development, which should conform with the overall methodology set out in GLVIA3. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an "equivalent". The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape i.e. a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards: https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments	Landscape and visual impacts are considered separately within the EIA Report at sections 7.9 and 7.10 of Chapter 7 – Landscape and Visual respectively.
THC-17	L&V - visualisation requirements	Separate volumes of visualisations should be prepared to both Highland Council Standards and NatureScot guidance. These should be provided in hard copy. It would be beneficial for THC's volume to be provided in an A3 ring bound folder for ease of use. The use of monochrome for specific	Photomontages have been produced to both THC and NatureScot guidance and are included

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		viewpoints is useful where there are a number of different wind farms in the view. We are happy to provide advice on this matter going forward.	in Volume 3a and Volume 3b of the EIA Report.
THC-18	L&V - consider all elements	All elements of a development are important to consider within any EIAR, including the visual impact of tracks, substations/other ancillary infrastructure, on-site borrow pits etc. Therefore, the assessment should include the expected impact of these elements, which should have their own site layout and elevation plans, notwithstanding that the principal structures will be a primary concern.	All aspects of the Proposed Development have been assessed, including temporary and permanent elements as well as landscape mitigation.
THC-19	L&V - wind farms for cumulative impact	It should be noted that there may be several renewable energy applications in the area that are yet to be determined/concluded in the vicinity of the application, which may or may not help clarify the weight towards particular policy elements in the final planning balance. We recommend that you utilise our interactive Wind Turbine map, which is up to date as of January 2024, to identify other schemes within the Study Area. The map can be accessed on the link below: https://highland.maps.arcgis.com/apps/webappviewer/index.html?id=5ec04b13a9b049f798cadbd5055f1787	Noted.
THC-20	L&V - guidance on viewpoints	It is important for assessors to remember that Visual Effects are defined by GLVIA3 not just as effects on views, but as “Effects on specific views and on the general amenity experienced by people”. It should be the case that some viewpoints are “Specific Viewpoints”, addressing key and promoted views, while others are “representative viewpoints” which represent effects on particular types of receptor in a more generalised area where similar effects may be experienced over a wider geographical area, as well as some “illustrative views” chosen to demonstrate a particular effect. The LVIA should clearly spell out which category each viewpoint falls into and ensure that the analysis assesses the effects on specific view and the effects on general amenity experienced by people.	The purpose of chosen visualisation locations is detailed in the EIA Report at Table 7.2 of Chapter 7 – Landscape and Visual .
THC-21	L&V - hours of darkness	THC generally prefers the term “Hours of Darkness” over “Night-Time” in recognition of how extensive hours of darkness can be in the Highlands. It is pertinent to the assessment to understand that Hours of Darkness Effects will be visible during people's working day and commuting hours for a significant part of the year and that sensitivities of receptors to these effects must account for this.	Noted and adopted in the text.
THC-22	L&V - gardens and designed landscapes	Gardens and Designed landscapes are considered as assets due to their design and relationship to the wider landscape in addition to their historic nature. Therefore, it would be appropriate for any aspects relating to landscape setting, or relationship to the wider landscape to be considered in the LVIA chapter, if necessary in addition to appearing in the Cultural Heritage Chapter.	There are no GDLs within the vicinity of the Proposed Development.
THC-23	L&V - micro-siting of viewpoints	The Council acknowledges that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos. We have also found that if the photographer has a 3D model on a laptop when they go out on site, it helps the orientation of the photography. Please note that the Council does not consider forestry a permanent fixture in the landscape and therefore expects LVIA's to assume bare earth, along with “permanent” physical infrastructure, baseline conditions, in order that effects are understood based on worst case scenarios.	Noted and addressed in the micro-siting of the viewpoint locations.
THC-24	L&V - state purpose of viewpoints	The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view, or for assessment of impact on designated sites, communities, or individual properties.	The purpose of chosen visualisation locations is detailed in the EIA Report at Table 7.2 of Chapter 7 – Landscape and Visual .
THC-25	L&V - methodology	Furthermore, the LVIA Chapter of the EIAR should clearly set out the methodology including: • Definitions of each point on the scale of magnitude of change which is used by the applicant in	The LVIA methodology is detailed in the EIA Report at Section 7.5 of Chapter 7 –

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		reaching a conclusion on the magnitude of change; • Definitions of each point on the scale of sensitivity of receptor which is used by the applicant in reaching a conclusion on the sensitivity of receptor; • The threshold to which the applicant considers a significant effect is reached. For the avoidance of doubt the Council consider that Moderate impacts can be significant, and it is recommended that the EIAR takes this approach as well; A clear matrix approach supported by descriptive text setting out how you have reached your conclusion of effect on landscape character, designated landscapes, visual receptors, and residential amenity.	Landscape and Visual. GLVIA3 does not advocate the use of a matrix and significance of effects is evaluated through professional judgement. Clear criteria are given for effect ratings with effects of Moderate or greater being considered significant.
THC-26	L&V - impacts on recreational routes	When assessing the impact on recreational routes please ensure that all core paths and long-distance trails, are assessed. The assessments of these routes should include a sequential assessment of how the development will be experienced in relation to existing and consented wind farms. We expect an assessment of the development's visual impacts on surrounding settlements.	Core paths and long-distance trails have been included where relevant. Potential effects on recreational routes have been assessed in the EIA Report as part of the visual assessment in Chapter 7 – Landscape and Visual at Appendix 7.2 . A sequential analysis of the mountain route to Spidean Mialach / Gleouraich has been provided in Appendix 7.2, Annex A . Cumulative impacts are discussed in Section 7.11, with consideration of potential combined effects with wind farm and hydro developments within the study area.
THC-27	L&V - cumulative impact and use of Panoramic Digital Viewer	The development will further extend the number of proposals of this type in the surrounding area, necessitating an appropriate cumulative impact assessment. It is considered that cumulative impact will be a significant material consideration in the final determination of any future application. Given the cumulative impact of renewable energy in this area it is expected that the applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there may be an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined schemes in the Council's Panoramic Viewer please see this link: http://www.highland.gov.uk/panoramicviewer .	Noted.
THC-28	L&V - refer to THC OWESG	We expect the Landscape Impact Assessment to refer to the Council's Onshore Wind Energy Supplementary Guidance and expect an assessment of the proposal against the criterion set out in the Council's OWESG at pages 19 and 20 to be included within the LVIA chapter of the EIAR. The site is located within the Loch Ness Landscape Character Areas Study referenced in the Onshore Wind Energy Supplementary Guidance.	A review of the Proposed Development against the criteria outlined in the Onshore Wind Energy Supplementary Guidance has been undertaken and is provided in Appendix 7.6 of the EIA Report.
THC-29	L&V - THC agree with NS re ZTV for construction track	Highland Council's Landscape Officer is in agreement with NatureScot's response, particularly with regard to the need for a ZTV on the proposed constructions track. They consider the predicted visibility of this element may give rise to a request for further visualisation locations to ensure that the effects are well understood and to aid mitigation by design.	A track ZTV is included as Figure 7.1c .
THC-30	L&V - Moidart, Morar and Glen Shiel SLA	The proposal sits within Moidart, Morar and Glen Shiel SLA. They note the development has potential to affect the Special Landscape Qualities (SLQ's) and Key Landscape and Visual Characteristics of the Moidart, Morar and Glen Sheil SLA. Particularly it has potential to intensify the: • Draw-down shorelines along reservoirs appear incongruous within mountain areas, highlighted by	Potential effects on designated and protected landscapes are considered in the EIA Report at Section 7.9 of Chapter 7 – Landscape and Visual . Potential effects on the Moidart, Morar

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		the light colour and linear form of these features. These detract somewhat from the sense of wildness within interior areas. This will have resulting effects on the SLQ of “Distinctive West Highland Composition”, most specifically the 1st, 2nd and 3rd bullet points: • The pattern of east-west-aligned mountain ridges, deep glens and lochs typifies the West Highland landscape. This is popular with visitors world-wide, and images of the landscape are often used to represent and promote some of the distinctive qualities of Scotland. The opportunity to reach many high peaks and to sustain height over long distances makes this area particularly popular for hill walking and climbing. • Much of the area represents the “back door” into Knoydart, Glenshiel and Kintail. At Kinlochhourn and the junction of Glen Dessary and Glen Pean at Strathan, long distance walking routes proceed west. Apart from the sporting estates and a limited number of forestry and hydro workers, the main users of this area are hillwalkers and wilderness enthusiasts who typically engage in multi-day treks. • Quiet, uninhabited glens and isolated peaks create a landscape experience where the sense of wildness, and tranquillity are key qualities.	and Glen Shiel SLA are assessed in more detail in Appendix 7.5 .
THC-31	L&V - additional viewpoint on C1144	In understanding the potential effects on the route to and from Kinloch Hourn, an additional viewpoint closer to the site than VP7 in the west would be informative. I would suggest somewhere in the vicinity of 201039, 803491, which would also represent the start point for the mountain track which rises towards Bac nan Canaichean.	This visualisation location has been included from the Minor Road near Bac nan Canaichean Path (See VL9, Figure V3a-9a-e and Figure 3b-9a-h)
THC-32	L&V - impacts on landscapes at national and local scale	An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. While NatureScot have responded separately to ECU on landscape and other matters, they previously raised concerns in the preapplication response for 23/01810/PREMAJ regarding the potential impacts of the proposed development on West Inverness-shire Lochs Special Protection Area (SPA) and Kinlochhourn - Knoydart - Morar Wild Land Area (WLA18).	Potential effects on designated and protected landscapes are considered in the EIA Report at Section 7.9 of Chapter 7 – Landscape and Visual . Potential effects on the Moidart, Morar and Glen Shiel SLA are assessed in more detail in Appendix 7.5 , and potential effects on WLA18: Kinlochhourn – Knoydart – Morar are assessed in Appendix 7.4 .
THC-33	L&V - aviation lighting impacts	The impacts of aviation lighting must be assessed through the EIA process. Further advice on aviation lighting is available from NatureScot, however, generally the impact of aviation lighting on WLA's and SLA's and areas where there would be an expectation of dark skies should be included.	There would be no visible aviation lighting required as part of the Proposed Development.
THC-34	Cultural heritage - EIAR requirements	The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify: • the architectural heritage (Conservation Areas, Listed Buildings); • the archaeological heritage (Scheduled Monuments); • the landscape (including designations such as National Parks, National Scenic Areas, Special Landscape Areas, Gardens and Designed Landscapes and general setting of the development; and, • the inter-relationship between the above factors. We would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. It would be helpful if, where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings could be provided.	There are no historic environment assets identified within the area affected by the Proposed Development.

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		Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.	
THC-35	Cultural heritage - no direct impacts anticipated	Highland Council's Historic Environment Team have not provided any further comments. They provided comments for the preapplication response 23/01810/PREMAJ previously which noted there are no recorded historic environment assets within the proposed development site boundary and the potential presence and survival of unrecorded remains is considered to be low. As such, direct impacts to cultural heritage are not envisaged to be a significant constraint in this case.	Noted – cultural heritage has been scoped out of the EIA on the basis of this and an equivalent response from Historic Environment Scotland.
THC-36	Ornithology - refer to NatureScot and RSPB re Schedule 1 birds	The presence of Schedule 1 Birds and/or European Protected Species must be included and considered as part of the planning application process; not as an issue that can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to any comments from NatureScot and RSPB in this respect.	Noted and assessed in the EIAR Chapter 10 – Ornithology .
THC-37	Ornithology - potential impacts	An assessment of the impacts to birds through collision, disturbance, and displacement from foraging/breeding/roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.	Noted and assessed in the EIAR Chapter 10 – Ornithology .
THC-38	Ecology - baseline survey requirements	The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc.) interest on site. It needs to be categorically established what species are present on the site, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans.	Baseline surveys of fauna and flora have been completed and are reported in Chapter 8 – Terrestrial Ecology, Chapter 9 – Forestry, Chapter 10 – Ornithology and Chapter 11 – Aquatic Ecology .
THC-39	Ecology -	Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programmes (such as native-tree planting, stock exclusion, etc.) for the proposed site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.	An outline Biodiversity Enhancement and Management Plan is provided at Appendix 8.7 to the EIAR. This recognises the species in the HBAP.
THC-40	Ecology - peat assessment	The developer should undertake a specific peat assessment to inform the siting, design, or other mitigation in order to overcome significant effects on peatland and Carbon Rich Soils, Deep Peat, and Priority Peatland Habitat (CPP). Attention is drawn to paragraph 4.34 on page 24 of the OWESG, which discusses peat and CPP. We also expect an up-to-date National Vegetation Classification (NVC) survey and a commitment to undertake peatland restoration on an area of increased size to that of the application site. The Environmental Impact Assessment Report (EIAR) should provide details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site.	A specific peat assessment has been carried out, including extensive peat probing and a full NVC survey of the site. These are documented in the EIAR at Chapter 8 – Terrestrial Ecology and Chapter 12 – Geology Soils and Water and their associated appendices.
THC-41	Ecology - designated sites	The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. NatureScot provide advice on the impact on designated sites.	The site does not overlap with any designated ecological sites but is functionally linked to the West Inverness-shire Lochs SPA. This is addressed in the EIAR at Chapter 10 – Ornithology. A shadow HRA has been prepared and will be submitted with the S36 application.

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THC-42	Ecology - deer impact assessment required	If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests.	A Wild Deer impact assessment has been carried out and is included in the EIAR at Chapter 8 – Terrestrial Ecology .
THC-43	Ecology - aquatic interests within watercourses	The EIAR needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk/incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds/timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.	These interests are covered in the EIAR in Chapter 2 – The Proposed Development , in Appendix 2.2 – Outline CEMD , and in Chapter 11 – Aquatic Ecology .
THC-44	Ecology - survey guidance	Further advice can be found in NatureScot's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken.	Noted.
THC-45	Ecology - GWDTE	The EIAR should include a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers, these habitats are easily damaged by insensitive drainage.	Results of the NVC survey including extent and assessment of potential GWDTE are detailed in Appendices 8.1a and 8.1b and summarised in the EIAR Chapter 8, Section 8.6: Baseline Conditions.
THC-46	Ecology - HMP and SPPs demonstrating mitigation and enhancement measures	NPF4's commitment to deliver positive effects for biodiversity through development. Policy 3 states that, "Development proposals for national, major and of EIA development should only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including nature networks within and adjacent to the site, so that they are in a demonstrably better state than without intervention, including through future management". A draft or outline Habitat Management Plan (HMP) and Species Protection Plan (SPP) should be produced as part of the EIAR, including any proposals for mitigation and enhancement in relation to important habitats and species. Any compensatory planting plans should be carefully considered and included in the HMP. The HMP should include a comprehensive monitoring programme for all habitat improvements, and breeding birds on the site. Remote sensing using radar or infra-red cameras should be considered, to help inform future development and decision making within the industry with regards to eagles. Lastly, the HMP (or other document) should also include a protocol for reporting collisions to NatureScot.	The EIA includes Appendix 8.7 – Outline Biodiversity Enhancement and Management Plan (OBEMP) addressing these points. A full BEMP and species-specific Species Protection Plans (SPPs) would be produced, per recommendations in Chapter 8 – Terrestrial Ecology , Section 8.10: Mitigation and Compensation, and in Chapter 9 – Forestry , Chapter 10 – Ornithology and Chapter 11 – Aquatic Ecology .
THC-47	Biodiversity Enhancement and Management Plan required	NPF4 Policy 3b. is applicable and requires biodiversity enhancement of the site post-construction in addition to mitigation and compensation measures. 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 Ecology Assessment. This will demonstrate that the development will significantly enhance the biodiversity of the site from its pre-development state by at least 10%. 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.	As THC-46 above.

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THC-48	BEMP requirements	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. 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.	Noted. The OBEMP has been prepared by experienced consultants from the EIA specialist team, whose details are at Appendix 1.1 – EIA Specialist Team .
THC-49	Water Environment - hydrology and hydrogeology	The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features including bog pools surrounding the proposed infrastructure, and sensitive receptors such as water supplies, need to be assessed and demonstrated that they will not be degraded by site drainage and excavations. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall that will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. The applicant is strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), however it is likely that a map and assessment of all engineering activities in or impacting on the water environment including proposed buffers, details of any flood risk assessment, and details of any related CAR applications will be required to be included with the EIAR. SEPA will identify whether a CAR license is necessary and the extent of information required to assess any license application.	A detailed review of the hydrological site setting has been undertaken and is presented in the EIAR at Chapter 12 – Geology, Soils and Water , and in Chapter 4 – Hydrology and Water Management . It has included water features, water supplies and habitats reliant on water and been used to identify sensitive receptors and inform the emerging development design. Potential effects on the water environment, good practice measures and required mitigation are discussed within Chapter 12, which include measures to control erosion, sedimentation and decolourisation. Periods of heavy rainfall and changing rainfall patterns as a result of climate change have also been considered. Consultation with SEPA has been undertaken and a plan prepared showing the development and water features and buffers. A flood risk assessment is also presented. A CAR licence application is in process with SEPA, running in parallel with the Section 36 planning application.
THC-50	Water Environment – water crossings	If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelling, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.	A schedule of new watercourse crossings, including their dimensions and photographs, is included in the EIAR as Appendix 12.4 . The detailed design of watercourse crossings would be agreed with consultees as part of the detailed design stage of the project.

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THC-51	Water Environment - drainage issues	The Council's Flood Risk Management Team had no comments to make at this stage. However, there are a number of watercourses on the site therefore the following applies: • All tracks should be kept a minimum 10m away from any waterbody except water crossings; • Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; • Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; • Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200 year flood event, plus climate change; • Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and, • The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment Supplementary Guidance.	It is confirmed that a minimum 10 m buffer to watercourses has been applied. It has been confirmed that the Proposed Development will use good practice drainage measures such as SuDS where technically possible and watercourse crossings will be designed to convey no less than the 1 in 200-yr flood event plus an allowance for climate change. A flood risk screening assessment has been prepared and is presented in the EIAR at Chapter 12 – Geology, Soils and Water.
THC-52	Water Environment - water abstractions	The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.	Information on water abstractions is included in the EIAR at Chapter 2 – The Proposed Development .
THC-53	Water Environment - private water supplies	The applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. This information should be in the form of a map and assessment of impacts upon groundwater abstractions and buffers. Highland Council has some information on known supplies, but it is not definitive. An on-site survey will be required.	A private water supply survey, risk assessment and proposed monitoring is included in the EIAR at 12.5 - Private Water Supply Risk Assessment .
THC-54	Operational noise - include powerhouse	Highland Council's Environmental Health Team note that given the distance from the site to the nearest receptor, the applicant proposes to scope out all operational noise other than any above ground noise associated with the operation of plant and activities. The scoping report proposes to scope out noise from the powerhouse. Whilst they appreciate there is a significant separation distance from the powerhouse and surrounding receptors they advised that the powerhouse be included in any operational noise assessment.	Noted. Operational noise is assessed in the EIAR at Chapter 16 – Noise and Vibration .
THC-55	Operational noise - baseline noise survey	The report also proposes to scope out a baseline noise survey and to apply fixed limits. Environmental Health would normally expect a noise assessment for this type of development to be undertaken in accordance with BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound. This methodology compares predicted noise levels against existing background levels however, if predicted levels are very low then a baseline survey may not be required. Without seeing the predicted levels, a definitive answer on the need for a baseline survey cannot be given at this time. It is agreed that a baseline survey would not be required for the construction noise assessment. Operational traffic noise can be scoped out of further assessment.	Noted. Operational noise is assessed in the EIAR at Chapter 16 – Noise and Vibration .
THC-56	Construction noise - planning conditions not used	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.	Noted. Construction noise is assessed in the EIAR at Chapter 16 – Noise and Vibration .

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THC-57	Construction noise - nearest sensitive receptor	It is understood the nearest noise sensitive receptor to the development site is Kingie Lodge at a distance of 3km. It is considered unlikely that construction noise will have a significant impact and a detailed noise assessment of that aspect would not be required.	Noted. Construction noise is assessed in the EIAR at Chapter 16 – Noise and Vibration .
THC-58	Construction noise - noise assessment required for SAR	Environmental Health noted it appears that the site will be accessed by an existing forest route to the south of Loch Garry which will be extended by a temporary access track to join the road closer to the hydro site. Noise from construction traffic and the formation of the temporary track has the potential for greater disturbance and a construction noise assessment in respect of these aspects of the development will be required. 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. 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. Particular attention should be given to the use of tonal reversing alarms and ground compaction plant which are often the most intrusive noise generating elements of a large construction project.	Noted. Construction noise is assessed in the EIAR at Chapter 16 – Noise and Vibration . The EIAR includes Appendix 16.3 – Draft Construction Noise & Vibration Management Plan (CNVMP) .
THC-59	Construction noise - demonstrate best practicable means	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. Particular attention should be given to the use of tonal reversing alarms and ground compaction plant which are often the most intrusive noise generating elements of a large construction project.	The EIAR includes Appendix 16.3 – Draft Construction Noise & Vibration Management Plan (CNVMP) .
THC-60	Dust	The applicant will be required to submit a scheme for the suppression of dust during construction.	Provision for a dust suppression scheme is included in the EIAR at Appendix 2.2 – Outline CEMD , which includes a Pollution Prevention Plan incorporating dust suppression.
THC-61	Private Water Supplies	Environmental Health note the applicant will be required to carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development. A report which includes details of the measures proposed to prevent contamination or physical disruption shall be submitted for the written approval of the Planning Authority. The report should include details of any monitoring prior to, during and following construction. If appropriate, it should also include proposals for contingency measures in the event of an incident. Highland Council has some information on known supplies which can be provided on request however, it is not definitive. An on-site survey will be required.	A private water supply survey, risk assessment and proposed monitoring is included in the EIAR at 12.5 - Private Water Supply Risk Assessment .
THC-62	Traffic and transport - THC interests in Council	Highland Council's Transport Planning Team notes that their interests will relate largely to the impact of development traffic on the Council maintained road network and its users during the construction phase of the project. Transport Scotland's interest will relate to the impact of development on the trunk road network.	Noted.

Ref	Subject	Consultee Comment	Response / Comments
	maintained roads		
THC-63	Traffic and transport - refer to Pre-application advice pack	The Transport Planning Team recommends that the applicant refers to the information provided for 23/01810/PREMAJ with regards to the scoping requirements in relation to traffic and transport related matters.	The information provided for 23/01810/PREMAJ has been referenced in preparation of the EIAR Chapter 15 – Transport and Access .
THC-64	Traffic and transport - agree C1144 not suitable for construction traffic	Although the change in traffic flows during the construction period may be temporary, due to the fragile nature of the C1144, which is an evolved road and not a designed road, permanent mitigation is likely to be required. In real terms, the impact of construction traffic on the C1144 will be significant and they agree with the statement in 1.2.5 that the “the C1144....is currently unsuitable for use by construction traffic of the type required to build a PSH scheme”.	The Proposed Development proposes to use the Southern Access Route (SAR) through Glengarry Forest for the main construction. It is proposed that the C1144 will be used for the ground investigation works and also for enabling works to construct the western end of the Southern Access Route, namely the bridge over the Gearr Garry and C1144 widening between the Southern Access Route and main site (approximately 2.5km). This is assessed in the EIAR at Chapter 15 – Transport and Access .
THC-65	Traffic and transport - give details for SAR	The potential use of a forestry track south of Glen Garry to avoid using the C1144 is welcomed (proposed Southern Access Route). The access points to the Southern Access Route from the A87 and C114 must be clearly shown on suitably dimensioned drawings including details of junction radii, surfacing and drainage as well as the required visibility splays and must be designed as per the requirements of the Council document “Roads and Transport Guidelines for New Developments”.	These drawings are included in the EIAR as figures associated with Chapter 2 – The Proposed Development .
THC-66	Traffic and transport - widening of section of C1144	The widening of the C1144 from the access to the Southern Access Route to the construction site is welcomed. Dimensioned drawings of the proposed road widening must be provided. The detailed design of the road widening will need to be approved through a Road Construction Consent (RCC) application and we recommend the applicant refers to the Council's website for details on the RCC process.	These drawings are included in the EIAR as figures associated with Chapter 2 – The Proposed Development and a RCC application will be prepared in due course.
THC-67	Traffic and transport - survey of Council roads required	A detailed assessment of the geometry and construction of the construction routes on the Council maintained roads, together with any structures along them will be required.	This will be provided in due course. The Applicant is aware of ongoing upgrades to the C1144 route and the structures along it. It is proposed that the survey be carried out on completion of these works or following the Proposed Development being consented, with the required works secured via an appropriately worded planning condition.
THC-68	Traffic and transport - contact THC team leader	Early contact should be made with the Council's Structures Team regarding any affected Council maintained structures. Contact Simon Farrow, Principal Engineer, simon.farrow@highland.gov.uk .	Noted.
THC-69	Traffic and transport -	It is noted that satellite parking, delivery areas, the main site compound and accommodation would be located off the Southern Access Route.	Noted.

Ref	Subject	Consultee Comment	Response / Comments
	compound area noted		
THC-70	Traffic and transport - ATC surveys	The Guidelines for the Environmental Assessment of Road Traffic was updated in 2023. Transport Planning welcome the applicants' confirmation that the study will take cognisance of the Transport Scotland document "Transport Assessment Guidance". THC consider the extents of the Council maintained roads in the study area are acceptable. Transport Planning consider the locations of ATC counts are acceptable. The Council may have traffic data and they recommend the applicant contacts Greg Otreba for confirmation of what if any, information is available (Grzegorz.otreba@highland.gov.uk). Transport Scotland should be consulted with regards to the extent of the study area and ATC surveys on the trunk road network. It is recommended that future growth is applied using High National Road Traffic Forecast estimates. For abnormal loads a swept path analysis will be required. Cyclists should be considered with regards to potential impacts. The study should explain the various stages of the project and the estimates of daily traffic generation within each stage, with the likely volume of HGV's, abnormal loads, LGV's and private cars clearly shown. The Council Planning Department should be contacted with regards to committed developments in the area.	Comment noted. We can confirm that project specific traffic surveys have been undertaken, supplemented by a combination of Department for Transport (DfT) and Transport Scotland (TS) traffic count data. These are included in the EIAR at Chapter 15 – Transport and Access. TS have been consulted regarding the proposed study area and proposals relating to traffic data as part of the Scoping exercise. We can confirm that High National Road Traffic Forecast (NRTF) estimates will be used within the assessment as requested. Swept path analysis will be carried out as part of the Abnormal Indivisible Load (AIL) assessment, which included as an Annex within the Transport Assessment at EIAR Chapter 15 – Transport and Access. Cyclists and other vulnerable road users are considered within the assessment in line with relevant guidance. The relevant information in relation to traffic generation is included within the Transport Assessment, including information on HGV, car / LGV and AIL movements. The Council planning department has been consulted and has advised of the committed developments that should be considered in the assessment. These have been included where relevant.
THC-71	Traffic and transport - framework CTMP required	A Framework Construction Traffic Management Plan (CTMP) should be included in the planning submission. The CTMP shall include measures to ensure that development traffic adheres to approved routes. Consultation with stakeholders including local community representatives may be necessary regarding the detailed content and implementation of the CTMP.	Noted. A Framework Construction Traffic Management Plan (CTMP) is included in the EIAR at Chapter 15 – Transport and Access. It is considered that the requirement for a full CTMP can be secured by an appropriately worded condition.

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			The Applicant is also engaged with the Glengarry Community Led Liaison Group, which has been initiated by the local community to better understand and coordinate the cumulative impact of traffic volumes and construction activities in the area.
THC-72	Traffic and transport - CTMP measures	Transport Planning see the measures in a CTMP being supplementary and complementary to any physical road improvements deemed necessary through the above referenced assessments. The measures in a final CTMP should be developed using feedback from engagement undertaken with local community groups (e.g. Local Community Councils), with consideration given to the following: • Avoidance of HGV routing past schools during their opening and closing times. • No convoying of HGV or site staff vehicles. Drivers will be asked to resolve convoys by spacing out trips if this arises during routing to/from the site. • Agreed routes to be used by all site staff, contractor, sub-contractor and deliveries unless origin/destination from elsewhere within the local area. • Steps to be taken for deterring/preventing construction traffic using non designated routes to and from the site. • Providers of products and materials to this development (e.g. aggregate or concrete, staff minibuses if used) should consider marking their vehicles with a unique number identifier on the front, sides and rear of the vehicles and a windfarm identifier. This enables easy identification in the event of problems arising, such as speeding or discourteous driving, as registration number plates are difficult to obtain. This is a well-established practice in other parts of The Highlands and has been found to be effective. It also helps to avoid issues with traffic from other developments being wrongly associated with this proposal. • Set up a single point of contact for local residents to use in the event of problems or concerns, such as in the above bullet point. This should be telephone and website details as a minimum, with consideration of Twitter, Facebook and other social media as appropriate. All such details should be provided to Community Councils for their notice boards and websites. • Toolbox talks established with all suppliers, contractors, site staff etc. to encourage careful and courteous driving at all times. Particular attention should be made to driving through villages and settlements, with cognisance of relevant speed restrictions and local conditions/limitations	Noted. As detailed above, a framework CTMP is included within the EIAR. It is considered that the requirement for a full CTMP can be secured by an appropriately worded condition, addressing those points raised.
THC-73	Traffic and transport - Wear and Tear agreement	Transport Planning Team would expect any submission to clarify the willingness to enter into a formal "Wear & Tear" Agreement (Section 96 of the Roads (Scotland) Act 1984) with Highland Council. This is to protect The Council from any extraordinary expenses in having to repair the local public roads from any damage inflicted by the construction traffic activities of this development. As with CTMP's, they would see this as supplementary to any physical improvements deemed necessary to make the local public roads safe and usable by all when being used for construction access to this development.	The Applicant is willing to enter into this Agreement, subject to agreement of its conditions.
THC-74	Traffic and transport - road survey requirements	Any submission should set out the intended arrangements for surveying and recording the existing condition of the local public roads impacted by the proposed construction access route(s) prior to any works commencing at this site. It should then clarify how the condition of those roads will be reviewed during and at the end of the proposed development, along with how any repairs deemed necessary will be undertaken.	The Applicant is willing to enter into a formal Wear & Tear agreement. This will form a suitably worded planning condition.

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THC-75	Traffic and transport - security bond	Depending on the construction routes settled on, The Council is likely to require some form of financial security/road bond that they'd be able to call on in the event of the Developer not being able to repair damage inflicted to the roads by their construction activities to the satisfaction of The Council as the Local Roads Authority. Again, any submission should clarify the Promoters willingness to consider some form of road bond or other financial security linked to a "Wear and Tear" agreement.	The Applicant is willing to enter into this Agreement, subject to agreement of its conditions.
THC-76	Traffic and transport - pre-construction road improvements	When undertaking pre-works condition surveys, the Promoter may want to use that data to consider whether any works are required to repair or stabilise the existing roads forming the proposed pre-construction access route(s) before their construction traffic starts to make use of them. It could be of benefit to the Promoter to work with Highland Council on such up-front repairs, as this could limit or remove the need for temporary restrictions to their proposed construction access arrangements during their works whilst emergency road repairs are undertaken.	The Applicant is happy to engage with THC on this aspect at the appropriate time.
THC-77	Traffic and transport - EIAR format	The above information is not exhaustive and shall be used as a guide for submission of all relevant information in relation to roads, traffic and transport matters arising from the development proposals, which shall be in the form of a Transport Statement/Assessment forming part of the Environmental Statement submission. The EIAR must also consider the implications on the Trunk Road network as part of the EIAR process.	Noted.
THC-78	Geology and Soils - EIA requirements	The EIAR must consider the risks of engineering instability relating to presence to peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.	A site specific PLHRA is presented in the EIAR as Appendix 12.1 - PLHRA . This has been informed by a comprehensive peat probing campaign, geomorphological mapping and analysis of slopes, and peat characteristics are required by best practice.
THC-79	Geology and Soils - implementing peat disturbance mitigation hierarchy	As previously noted, the EIAR should include a full assessment on the impact of the development on peat. Policy 55 Peat and Soils, of the Highland Wide LDP, states that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils. As such, the phase 1 peat depth survey as proposed in the Scoping Report is welcomed in order to ensure that the final infrastructure design avoids deep peat and any sensitive habitats. The mitigation hierarchy must be followed, with impacts avoided and minimised where possible.	Noted. Details of Phase I and Phase II peat probing surveys are included in the EIAR at Appendix 12.1 - PLHRA and Appendix 12.2 - PMP and a summary is included in the Chapter 12 – Geology, Soils and Water .
THC-80	Geology and Soils - presentation of peat probing data	SEPA can provide detailed advice on methodology for peat probing and the peat assessment. The peat depth survey should be presented as a table detailing re-use proposals.	Noted.
THC-81	Geology and Soils - requirement for carbon balance calculations	Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.	Carbon balance calculations are included in the EIAR at Appendix 12.3 – Carbon Calculator .
THC-82	Geology and Soils - EIAR requirements	The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to	Noted. Potential effects on geology are included in the EIAR at Chapter 12 – Geology, Soils and Water .

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		minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile, Site Management Plan and pollution prevention measures. Borrow pits should be located in an area demonstrating the least environmental impact, while any aggregate sourced from offsite should not impact on the chemistry of the existing groundwater and must be of a high enough quality not to cause siltation to waterbodies or wetlands. Including this information can avoid the need for further applications.	The Proposed Development would seek to maximise the use of site-won material over imported. Borrow pits are proposed to be located adjacent to the main scheme elements and in areas of apparently suitable ground conditions. The Proposed Development has a mass balance for rock and soil materials i.e no excess material would be generated that would be required to leave the site. The borrow pits would be excavated only until sufficient material has been won Refer to Chapter 2 – The proposed Development and Appendix 2.3 – Mass Balance Strategy and Borrow Pit Plan for details.
THC-83	Geology and Soils - requirement for PMP	In order to protect peatland and limit carbon emissions from carbon rich soils a Peatland Management Plan (PMP) should be provided. The PMP should demonstrate that proposals: • Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories; • Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth; • Minimise impact on local hydrology; and • Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of the Peatland Survey – Guidance on Developments on Peatland (2017).	A site specific PMP is included in the EIAR as Appendix 12.2 - PMP and demonstrates application of the mitigation and re-use hierarchy in the development proposals as required by good practice guidance. The PMP has been informed by a comprehensive programme of peat depth probing.
THC-84	Geology and Soils - peat condition categorisation	The Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. This should be used to identify peatland in near natural condition and can be helpful in identifying areas where peatland restoration could be carried out.	A peatland condition assessment is included and assessed in the EIAR at Chapter 8: Terrestrial Ecology.
THC-85	Geology and Soils - peat restoration	In line with the requirements of Policy 5d. of NPF4, the development proposal should include plans to restore and/or enhance the site into a functioning peatland system capable of achieving carbon sequestration. The PMP should also include: • Information on peatland condition; • Information demonstrating avoidance and minimisation of peat disturbance; • Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes; • Proposals for temporary storage and handling; • Reuse volumes in different elements of site reinstatement and restoration.	A site-specific Peat Management Plan (Appendix 12.2) has been prepared which shows how soils and peat will be managed and safeguarded. In addition, Appendix 8.7 - Outline Biodiversity Enhancement and Management Plan includes details of the proposed peatland restoration proposed to provide compensation and enhancement of peatland habitats. The PMP also presents details of the volume of acrotelmic and catotelmic peat, proposals for storage, and handling and, re-use.

Ref	Subject	Consultee Comment	Response / Comments
THC-86	Geology and Soils - peat handling	Handling and temporary storage of peat should be minimised. catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, re-profiling/landscaping, spreading, mixing with mineral soils or use in bunds.	Addressed in the EIAR at Appendix 12.2 – Peat Management Plan .
THC-87	Geology and Soils - use of surplus peat	Disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations outwith the development boundary).	Addressed in the EIAR at Appendix 12.2 – Peat Management Plan .
THC-88	Forestry - existing conditions	Whilst Highland Council's Forestry Officer has not had a chance to visit the site, they have provided the following comments having compared the proposals with scaled aerial photography, Native Woodland Survey of Scotland (NWSS) and Ancient Woodland Inventory (AWI). The proposed development site is located within largely open ground where there does not appear to be much in the way of significant areas of woodland. Although they note in Appendix 9.3 National Vegetation Classification (NVC) Habitat Plan there are some small areas of riparian woodland along the Allt Fearnna and alongside Loch Cuaich. None of the existing woodland is listed on the Native Woodland Survey of Scotland or the Ancient Woodland Inventory.	Noted.
THC-89	Forestry - tree loss requirements	The Scheme Arrangement drawing (Figure 3.2 P1) shows the proposed access crossing the Allt Fearnna where there is likely to be a loss of trees. It is recommended the applicant has a tree survey carried out in this area to ensure that the route of the track is positioned to minimise adverse impact on existing trees. Where tree losses are unavoidable, a compensatory tree planting plan will be required. As it stands, a specific chapter on forestry would not be required. However, if there is any change to the layout of the access track or associated infrastructure which might impact on woodland then a forestry chapter will be required.	The EIAR includes Chapter 9 – Forestry , which addresses these points.
THC-90	Forestry - baseline survey	If required, the Environmental Statement (ES) should provide a baseline survey of the trees and plants (including fungi, lichens and bryophytes) present on the site to determine the presence of any rare or threatened species. The layout should be designed to ensure there is no/minimised adverse impact on native or ancient woodland. The ES should also indicate areas of woodland/forestry plantation which may need to be felled to accommodate new development (including the access) and any off site works/mitigation. Compensatory planting of new woodland is a clear expectation where there are any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If trees are to be removed, compliance with the Scottish Government's Control of Woodland Removal Policy must be demonstrated.	The EIAR includes Chapter 9 – Forestry , which addresses these points.
THC-91	Contaminated Land - no specific concerns	Considering the nature of the site presented in the Scoping Report, there are no specific concerns in this respect.	Noted.
THC-92	Socio-Economic, Recreation and Tourism - separate chapter in EIAR	It is considered that this should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and	The EIAR includes Chapter 17 – Socioeconomics and Tourism , which addresses these points.

Ref	Subject	Consultee Comment	Response / Comments
		economic activity associated with the procurement, construction, operation and decommissioning of the development.	
THC-93	Socio-Economic, Recreation and Tourism - guidance on methodology	Estimations of who may be affected by the development, in all or in part, which may require individual households to be identified, local communities or a wider socio-economic groupings such as tourists and tourist related businesses, recreational groups, economically active, etc. should be included. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.	The EIAR includes Chapter 17 – Socioeconomics and Tourism , which addresses these points.
THC-94	Community Benefit - Scottish Government Policy	Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are also highlighted in Scottish Government Policy documents, with the aforementioned Policy Statement reinforcing the notion that the right development should be permitted in the right place.	The Applicant is committed to the principles of THC's Social Values Charter for Renewables Investment. Early discussions have taken place with THC's Economic Development and Regeneration Team.
THC-95	Community Benefit - balance of renewable energy with planning requirements	Notwithstanding that renewable energy developments contribute to the production and supply of renewable energy, The Council maintains that this commitment must be taken in balance along with all other considerations, and that such developments should be located, sited, and designed appropriately and thus assessed against the wider development plan policies.	As above.
THC-96	Community Benefit - developer contributions	Developer Contributions, Community Benefit & Community Wealth Building will all need to be considered as the scheme develops with Developer Contributions sought towards Transport (including Active Travel), Green Infrastructure, Water & Waste and Public Art/Realm in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018).	As above.
THC-97	Community Benefit - THC policy	Your attention is also drawn to the fact that the council has a separate remit to promote community benefit which is distinct and separate from planning. The policy contains contacts for further discussion on this matter and we would encourage the developer to engage early in the process. The Council's position with regard community benefits has recently been updated with the approval of a new 'Social Values Charter for Renewables Investment' at its meeting on 27 June 2024, with the report available at the following link: https://www.highland.gov.uk/meetings/meeting/5003/highland_council .	As above.
THC-98	Community Benefit - community wealth building strategy	Community Wealth Building is intended to encourage, promote, and facilitate a new strategic approach to economic development as set out in NPF4 Policy 25. This Policy indicates examples of what contributions by development proposals to community wealth building could include: 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. However, that is not an exhaustive list.	As above.

Ref	Subject	Consultee Comment	Response / Comments
THC-99	Community Benefit - community wealth building purpose	Community Wealth Building is intended to encourage, promote, and facilitate a new strategic approach to economic development as set out in NPF4 Policy 25. This Policy indicates examples of what contributions by development proposals to community wealth building could include: 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. However, that is not an exhaustive list.	As above.
THC-100	Public Access - impacts and opportunities	The Access Officer notes there are two aspects of the project to consider from the Access Authority's perspective. One is the impact which the construction phase and permanent works have on existing access routes. The other is what opportunity exists in terms of access improvements as a legacy of the project.	These aspects are addressed in the EIAR at Chapter 14 – Recreation and Access , and in the associated Appendix 14.1 – Draft Outdoor Access Management Plan , which has been developed in consultation with the THC Access Officer.
THC-101	Public Access - draft OAMP & reference Pre-application pack comments	The Access Officer is pleased that the Environmental Scoping Report states that a Draft Outdoor Access Management Plan will be included within the detailed planning submission. They ask that this is developed in line with Appendix 6 of NatureScot's Environmental Impact Assessment Handbook and that it is submitted as a stand-alone document, or clearly indexed within the EIA, so that it is easy to identify. Additionally, all points raised in the Access Officer consultation response for the preapplication 23/1810/PREMAJ shall be taken into consideration except those that have been superseded by the enlargement of the planned reservoir.	The EIAR Includes Appendix 14.1 – Draft Outdoor Access Management Plan , which addresses these points and has been developed in consultation with the THC Access Officer.
THC-102	Public Access - summits affected	The scoping reports notes that here are a number of summits in the area which are popular with hill walkers, including the Munros of Spidean Mialach and Gleouraich immediately to the north of the upper reservoir. Hillwalkers generally make a round of these Munros in a clockwise direction from a parking area beside the single-track road along Loch Quoich. The usual descent route will be inundated by the upper reservoir at Loch Fearn and Coire Dubh.	Noted. This assessed in the EIAR at Chapter 14 – Recreation and Access .
THC-103	Public Access - requirements for EIAR	The Access Officer recommends that the Outdoor Access Management Plan (OAMP) includes a Red (Specification) path survey, as defined here (Upland Path Management (nature.scot) for any diversion of this well used route and that the OAMP indicates how the developer proposes to manage mountaineering access both around the inundation area and where the path is crossed by any newly built access roads, as well as the visual impact of any diversion route. This may require a further series of visualisations from where the path is severed by the proposed reservoir, and from points along any suggested alternative diversionary routes. Any route proposal should consider whether there is a significant increase in the steepness of the ground covered, an increase in the length of the path, and whether the route necessitates a longer return along the public road. Consultation with stakeholders and the Outdoor Access Officer is recommended as this proposal is developed.	These points are addressed in the EIAR at Chapter 14 – Recreation and Access , and in the associated Appendix 14.1 – Draft Outdoor Access Management Plan , including a commitment to a Red Specification path survey and additional visualisations at path diversions at the upper reservoir.
THC-104	Public Access - mapping of access routes	The Access Officer is pleased to note that existing land use and recreational routes and points of interest within the study area will be mapped and presented, including the Munro circuit discussed above, as well as other mountain routes, Rights of Way, Scottish Hill Tracks, and popular camping/recreational spots in the area around Loch Quoich.	Noted. These aspects are addressed in the EIAR at Chapter 14 – Recreation and Access , and in the associated figures and appendices.
THC-105	Public Access - maintaining access	Policy 77 also states 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.	Access to water is covered in the EIAR at Chapter 14 – Recreation and Access and in Appendix 14.1 – Draft Outdoor Access Management Plan .

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THC-106	Public Access - access to Loch Quoich	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.	Access to Loch Quoich is covered in the EIAR at Chapter 14 – Recreation and Access and in Appendix 14.1 – Draft Outdoor Access Management Plan .
THC-107	Public Access - existing data sources	The Access Officer would recommend that data from Strava Heat maps and information on Rights of Way held by Scotways are included in the proposed review of existing access routes, and that consultation takes place with stakeholders, at a local and national level.	Data from Strava and Scotways has been used in the EIA. Local and national consultation has taken place with relevant stakeholders – this is recorded in the EIAR at Chapter 4 – Assessment Methodology, Scoping and Consultation .
THC-108	Public Access - mitigation and access improvements	The Access Officer is keen to see a recognition of the loss of visual and physical amenity inherent within this development proposal and would welcome a discussion about both mitigation measures and possible access improvements.	Mitigation measures and access improvements are covered in the EIAR at Chapter 14 – Recreation and Access and in Appendix 14.1 – Draft Access Management Plan .
THC-109	Health and Safety - climatic factors	The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation, and decommissioning. Issues such as dust, air borne pollution and/or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw.	All relevant climatic factors have been considered in the relevant technical chapters of the EIAR. Their effects on reservoir safety are further covered by the application of the Reservoirs (Scotland) Act 2011 to the construction and operation of the dams included in the Proposed Development.
THC-110	Health and Safety - dust suppression	Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.	Dust suppression will be included in the Pollution Prevention Plan which is a component of the Outline Construction Environmental Management Document (CEMD), included in the EIAR at Appendix 2.2 – Outline CEMD .
THC-111	Health and Safety - provide CEMD	A number of the aforementioned matters should be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application as well as an outline Decommissioning and Reinstatement Plan.	The EIAR includes Appendix 2.2 – Outline CEMD . With proper maintenance, the Proposed Development should remain functional indefinitely and as such an assessment of decommissioning effects has not been provided as part of the EIA Report, although brief details of decommissioning in the event that it was necessary are included in Chapter 2 – The Proposed Development .
THC-112	Community Council - consultation response provided	Glengarry Community Council submitted their consultation comments raising concerns regarding landslide, flood risk, increased traffic, impact on access and roads, landscape and visual impact, ecological impact, socio-economic impact, decommissioning and noted the previous refusal at the location.	Noted. These points are responded to in lines GGCC-01 to GGCC-44 below.

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THC-113	Significant Effects on the Environment	Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium, and long-term, permanent and temporary, positive and negative effects of the development, resulting from: • the existence of the development; • the use of natural resources; and, • the emission of pollutants, the creation of nuisances and the elimination of waste.	This is covered in the EIAR Chapter 4 – Assessment Methodology, Scoping and Consultation , with additional details where necessary in the various technical chapters of the EIAR.
THC-114	Significant Effects on the Environment	The potential significant effects of development must have regard to: • the extent of the impact (geographical area and size of the affected population); • the trans-frontier nature of the impact; • the magnitude and complexity of the impact; • the probability of the impact; and, • the duration, frequency, and reversibility of the impact.	As above.
THC-115	Significant Effects on the Environment	The effects of development upon baseline data should be provided in clear summary points.	As above.
THC-116	Significant Effects on the Environment	The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative, or strong negative.	As above.
THC-117	Significant Effects on the Environment	The applicant should provide a description of the forecasting methods used to assess the effects on the environment.	As above.
THC-118	Mitigation - describe mitigations in the EIAR	Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach, or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reducing and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.	As above.
THC-119	Mitigation - schedule of mitigation required	The mitigation being tabled in respect of a single development proposal can be manifold. Consequently, the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP), which in turn will set the framework for individual Construction Method Statements (CMS).	The EIAR includes Chapter 19 – Mitigation Schedule and Appendix 2.2 – Outline CEMD .
THC-120	Mitigation - identify liaison groups for mitigation	The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.	The EIAR at Chapter 2 – The Proposed Development nominates the already established Glengarry Community Led Liaison Group, a sub-group of the Glengarry Community Council, as the focal point for community liaison in relation to mitigations.

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SEPA-01	Scaled plans of sensitivities	To avoid delay and potential objection the EIA submission must contain a scaled plan of sensitivities, for example peat, GWDTE, proximity to watercourses, overlain with proposed development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, and then reduce then mitigate significant impacts on the environment. The issues covered in Appendix 1 'Detailed Scoping Requirements' must be addressed to our satisfaction in the EIA process. Appendix 1 provides details on our standard information requirements for an EIA.	This is provided in the various EIAR documents and figures.
SEPA-02	Provide programme	We would prefer to see more detail on the phasing of the works; a series of plans showing exploratory works, enabling works (including road improvements) and final construction works would be useful.	The EIAR includes a project programme at Appendix 2.4 – Outline Project Programme .
SEPA-03	Provide PMP and GWDTE assessment	In this case, where much of the site is on peat and groundwater dependent terrestrial ecosystems (GWDTEs) are present, we expect the application to be supported by a comprehensive site-specific Peat Management Plan with GWDTE Assessment.	The occurrence and distribution of GWDTE is discussed and assessed in Section 12.6 of the EIAR Chapter 12 – Geology, Soils and Water , specifically Table 12.5. A comprehensive peat management plan has been prepared and is provided in Appendix 12.2 - PMP and summarised in Section 12.6 of Chapter 12.
SEPA-04	PMP requirements	The Peat Management Plan 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. In this case, it seems likely that more peat will be disturbed than can be used in site reinstatement. We ask that the Peat Management Plan clearly identifies the volumes of peat which will need to be put to other uses and identifies what they are, with any proposals for peatland restoration contained within a Habitat Management Plan. The Habitat Management Plan should provide proposals for peatland and habitat restoration, with plans showing areas for proposed works.	Details of disturbed peat, peat re-use and habitat restoration is provided in the EIAR at Appendix 12.2 - PMP and in Appendix 8.7 - Outline Biodiversity Enhancement and Management Plan .
SEPA-05	GWDTE requirements	As there are several GWDTEs and deep peat present on site, and the proposed new access tracks appear to cross some areas of deep peat, the forthcoming EIA should also address this. Wherever possible, tracks should be re-routed to avoid areas of deep (>0.5m) peat. Floating roads should be considered. The proposed infrastructure should be micro-sited to avoid the GWDTE identified through the NVC survey (proposed infrastructure should be superimposed on the NVC map highlighting where the GWDTEs are situated, so they can be avoided). If this cannot be avoided, justification and mitigation proposals should be included in the forthcoming EIA.	Areas of deep peat have been avoided where technically feasible and existing tracks utilised where possible. Effects on peat are discussed in full in Appendix 12.1 - PLHRA and Appendix 12.2 - PMP . Effects on GWDTE are considered in Section 12.6 and Section 12.8 of the EIAR Chapter 12 – Geology, Soils and Water .
SEPA-06	Risks to groundwater	Risks to groundwater and groundwater receptors are covered within Chapter 12 of the Scoping Report – Geology, Soils and Water (we agree that assessment of these risks should be scoped in). Site walkovers and desk studies should be carried out to characterise sensitive receptors such as private water supplies (PWS).	Noted. Potential effects and details of the desk study and field study with respect to identified sensitive receptors is discussed in the EIAR Chapter 12 – Geology, Soils and Water .
SEPA-07	Impacts on groundwater abstractions	SEPA's Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems should be followed to determine the risk assessment approach for groundwater abstractions (including PWS). Guidance Note 31 should also be followed to determine whether baseline and operational monitoring will be required for identified receptors.	Noted. SEPA Guidance Note 31 has been used for the assessment of GWDTE presented in the EIAR Chapter 12 – Geology, Soils and Water .

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SEPA-08	Assessment of risk of acidic or metalliferous drainage	No mention is made of potential risk to the environment from acidic and/or metalliferous drainage from excavated material. Assessment of this risk should be included, appropriate to site characteristics.	The EIAR Chapter 12 – Geology, Soils and Water confirms that prior to any construction being undertaken, all elements of the Proposed Development, and especially the proposed tunnels from which soils would be generated, would be subject to site investigation and materials testing. The results of which would be used to design drainage measures (and if required water treatment) that will safeguard the water environment.
SEPA-09	Provide map of engineering works	A map and assessment of engineering works within and near the water environment (with buffer zones) should be included, including the location and design of all intakes and outfalls and their potential impact upon the morphology of the water environment. Any 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.	Watercourses and waterbodies including a 50 m buffer to the water features are shown in the EIAR on Figure 12.1.
SEPA-10	Hydro operation and fish access infrastructure	Unless the applicant has already submitted the following as part of a CAR application, the following information should be also included: - Details of the hydro-electric operation regime, including compensation flows. - Details of any proposed fish access infrastructure.	This information is provided in the EIAR at Chapter 2 – The Proposed Development and at Chapter 4 – Hydrology and Water Management . It will also be included in the CAR licence application.
SEPA-11	Dewatering requirements	If any dewatering is proposed (e.g. for borrow pits), it should comply with SEPA General Binding Rules, in particular GBR15. If it is not possible to undertake dewatering in line with GBR15 rules, it will need to be part of the CAR licensing.	Noted.
SEPA-12	Regulatory advice for the applicant	Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: AHSH@sepa.org.uk	Noted.
SEPA-13	Site layout	All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded where possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-14	Engineering activities which may have adverse effects on the water environment	The site layout should be designed to minimise watercourse crossings and avoid other direct impacts on water features. The submission must include a map showing: - All proposed temporary or permanent infrastructure overlain with all lochs and watercourses. - A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location,	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.

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		dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works. Measures should be put in place to protect any downstream sensitive receptors.	
SEPA-15	Guidance on watercrossings	Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-16	Flood risk advice	Refer to our Flood Risk Standing Advice for advice on flood risk. Crossings must be designed to accommodate the 0.5% annual exceedance probability flows (with an appropriate allowance for climate change), or information provided to justify smaller structures. If it is considered the development could result in an increased risk of flooding to a nearby receptor then a flood risk assessment (FRA) must be submitted. Our Technical Flood Risk Guidance for Stakeholders outlines the information we require to be submitted in an FRA. Please also refer to Controlled Activities Regulations (CAR) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-17	Disturbance and re-use of excavated peat and other carbon rich soils	1.1 Where proposals are on peatland or carbon rich soils the following should be submitted to address the requirements of NPF4 policy 5: a) layout plans showing all permanent and temporary infrastructure, with extent of excavation required, which clearly demonstrates how the mitigation hierarchy outlined in NPF4 has been applied. These plans should be overlaid on: i. peat depth survey (showing peat probe locations, colour coded using distinct colours for each depth category and annotated at a usable scale) ii. peat depth survey showing interpolated peat depths iii. peatland condition mapping iv. NVC habitat mapping. b) an outline Peat Management Plan (PMP)	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-18	Protection of peatland	In order to protect peatland and limit carbon emissions from carbon rich soils, the submission should demonstrate that proposals: · Avoid peatland in near natural condition, as this has the lowest greenhouse gas emissions of all peatland condition categories · Minimise the total area and volume of peat disturbance. Clearly demonstrate how the infrastructure layout design has targeted areas where carbon rich soils are absent or the shallowest peat reasonably practicable. Avoid peat > 1m depth · Minimise impact on local hydrology · Include adequate peat probing information to inform the site layout and demonstrate that the above has been achieved. As a minimum this should follow the requirements of the Peatland Survey – Guidance on Developments on Peatland (2017).	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-19	Peatland condition assessment	The Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. This should be used to identify peatland in near natural condition, which should then be avoided.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-20	PMP requirements	The Outline Peat Management Plan (PMP) should also include: · Information on peatland condition. · Information demonstrating avoidance and minimisation of peat disturbance.	The EIAR complies with these minimum information requirements issued as Appendix 1

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		- Excavation volumes of acrotelmic, catotelmic and amorphous peat. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes. - A table clearly demonstrating the volumes of excavated peat required for all proposed reuses or disposal. - Proposals for temporary storage and handling. - Details of the excavated peat use proposals within the site, for example making good areas disturbed by development, including borrow pits, or the proposals for disposal of peat.	of SEPA's scoping response letter dated 22 May 2024.
SEPA-21	Peat handling requirements	Handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, re-profiling/ landscaping, spreading, mixing with mineral soils or use in bunds.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-22	Beneficial use of excavated peat	Excavated peat can be used to make good areas which have been disturbed by the development. Quantities used must be the minimum required to achieve the intended benefit and materials must be suitable for the proposed use. Should there be an intention to discard peat then you should clearly outline these proposals so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-23	Seal cut batter faces	The faces of cut batters, especially in peat over 1m, should be sealed to reduce water loss of the surrounding peat habitats, which will lead to indirect loss of habitat and release of greenhouse gases. This may be achieved by compression of the peat to create an impermeable subsurface barrier, or where slope angle is sufficiently low, by revegetation of the cut surface.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-24	Disruption to GWDTE and existing groundwater abstractions	Groundwater dependent terrestrial ecosystems (GWDTE) are protected under the Water Framework Directive. Excavations and other construction works can disrupt groundwater flow and impact on GWDTE and existing groundwater abstractions. The layout and design of the development must avoid impacts on such areas. A National Vegetation Classification survey which includes the following information should be submitted: a) A map demonstrating all GWDTE and 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. The survey needs to extend beyond the site boundary where the distances require it. b) If the minimum buffers cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. 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.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-25	Forest removal and forest waste	If forestry is present on the site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality. The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-26	Borrow pits	The following information should also be submitted for each borrow pit: a) A map showing the location, size, depths and dimensions b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure	The EIAR complies with these minimum information requirements issued as Appendix 1

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		including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250m. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks; c) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.	of SEPA's scoping response letter dated 22 May 2024.
SEPA-27	Pollution prevention and environmental management	A schedule of mitigation supported by the above site-specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ecological clerk of works, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the Guidance for Pollution Prevention (GPPs) and our water run-off from construction sites webpage for more information.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
SEPA-28	Life extension, repowering and decommissioning	The discarding of materials as waste should be avoided. However, if there is an intention to discard materials then further guidance on this may be found in the document Is it waste - Understanding the definition of waste. The layout and the general principles for decommissioning must demonstrate waste minimisation and compliance with the above waste regulatory position.	The EIAR complies with these minimum information requirements issued as Appendix 1 of SEPA's scoping response letter dated 22 May 2024.
NS-01	Key issues	The key issues relevant to our interests which need to be addressed in the Environmental Impact Assessment Report (EIAR) are: · The impacts on West Inverness-shire Lochs Special Protection Area (SPA) · The impacts on Kinlochhourn - Knoydart - Morar Wild Land Area (WLA18) The results of these assessments will be critical to any subsequent advice we give and the position we take should this proposal progress to a formal application.	Noted – covered in subsequent responses / comments.
NS-02	Additional information requested	We broadly agree with the proposed scope of surveys and assessments to be included in the EIAR; these generally meet the requirements we would expect. However, we advise that extra information is included in the EIAR should this scheme progress to full application. We have detailed the extra information required in the Annex to this letter.	Noted. Addressed
NS-03	Submission file size	We ask that you save each chapter of the EIAR to a separate pdf file of no greater than 10 MB in order to make them compatible with our corporate filing system, with file names that relate to the content of each chapter.	Noted and actioned.
NS-04	Advice without prejudice to EIA	Please note that while we are supportive of the principle of renewable energy, our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.	Noted.
NS-05	Guidance for biodiversity enhancement	NPF4 Policy 3 sets out new requirements for biodiversity enhancement. Policy 3 requires that large-scale development proposals such as this demonstrate that 'the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention'. Scottish Government is currently developing guidance for National, major and EIA applications. But in the meantime advice is available on our Planning and development: Enhancing biodiversity page.	Noted. An Outline Biodiversity Enhancement and Management Plan is provided in the EIA Report at Appendix 8.7 .

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NS-06	NPF4 requirement for WLA	NPF4 Policy 4(g) indicates that only certain categories of development proposals will be supported within Wild land Areas. These are where the proposal: - will support meeting renewable energy targets or, - All such 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 wild land, as well as any management and monitoring arrangements where appropriate. Technical guidance is available at https://www.nature.scot/doc/assessing-impacts-wild-land-areas-technical-guidance	Potential effects on WLA18: Kinlochhourn - Knoydart - Morar have been assessed in the EIA Report at Chapter 7 – Landscape and Visual and in Appendix 7.4 . Further consultation was undertaken, as discussed in paragraphs 7.3.4 of the EIAR Chapter 7. Potential cumulative effects are discussed in Section 7.11 of the EIAR Chapter 7.
NS-07	Carbon rich soils impact justification	NPF4 Policy 5 (Soils) provides protection for carbon-rich soils and peatlands. Policy 5c) indicates that development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for: - Essential infrastructure and there is a specific locational need and no other suitable site including; Renewable energy generation - Proposals must meet specific requirements including for assessment, project design, mitigation, production of a peat management plan and other appropriate plans required for restoring and/ or enhancing the site into a functioning peatland system capable of achieving carbon sequestration.	Noted.
NS-08	Biodiversity enhancement requirements	Policy 3 (Biodiversity) also applies to all development proposals, so any proposal affecting carbon-rich soils and peatlands must also take into account the requirements to conserve, restore and enhance biodiversity, including priority peatland habitats.	An Outline Biodiversity Enhancement and Management Plan is provided in the EIA Report at Appendix 8.7 . This document and the compensation strategy summarised in Chapter 8, Section 8.12: Biodiversity Enhancements detail biodiversity enhancement objectives relating to priority peatland habitat. A full BEMP and will be produced, per recommendations in Section 8.10: Mitigation and Compensation.
NS-09	Landscape and Visual - effects on WLA	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 (WLA 18). 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.	Noted
NS-10	Landscape and Visual - General agreement with scope of assessment	We generally agree with scope of the assessments proposed, but provide further comment and advice below.	Noted.
NS-11	Landscape and Visual - Extent of Visibility	A ZTV has been provided with shows the predicted visibility of the proposed Coire Dubh Dam and Fearna Dam separately. The ZTV shows that visibility of the proposed dams would be precluded to the north by the Spidean Mialach ridge. There would however be extensive visibility of both dams over the western extent of Loch Quoich and to the south and east of Glen Kingie over WLA18. There would also be visibility of the proposal over the eastern extents of the Knoydart NSA south of Kinlochhourn. A ZTV of the proposed permanent access track, powerhouse and upper inundation would be helpful to understand areas of visibility from each of these components of the proposed development.	ZTVs have been included in the EIA Report for the powerhouse, upper access tracks and dams at the upper reservoir area (see Figures 7.1a-c in Chapter 7 – Landscape and Visual).

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NS-12	Landscape and Visual - Effects on Wild Land Areas (WLAs)	Given the proposal's siting within, and predicted visibility of the proposal over, WLA 18, potential effects on WLA 18 will require to be fully understood and a Wild Land Assessment (WLIA) will be required. We advise the Applicant to consult NatureScot on the final selection of Wild Land Qualities (WLQs) to be included for in the WLIA. We advise that given the proposed siting and predicted theoretical visibility of the proposal over the Kinlochhourn-Knoydart-Morar WLA a Wild Land Impact Assessment will be required.	Potential effects on WLA18: Kinlochhourn - Knoydart - Morar have been assessed in the EIA Report at Chapter 7 – Landscape and Visual and in Appendix 7.4 . Further consultation was undertaken, as discussed in paragraphs 7.3.4 of the EIAR Chapter 7. Potential cumulative effects are discussed in Section 7.11 of the EIAR Chapter 7.
NS-13	Landscape and Visual - Effects on National Scenic Areas (NSAs)	The ZTV shows that there would be predicted visibility of the proposal over eastern areas of the Knoydart NSA. To allow us to better understand the potential effects from the proposal on SLQ2 – One of Scotland's last great wild areas of the NSA and to inform whether further assessment would be required, in the first instance, the following wireline would assist: Mountain route south of Sgurr Dubh around co-ordinates 194016E 805089N. We advise that further consideration is given to the inclusion of wirelines where there is predicted theoretical visibility of the proposal over the Knoydart NSA to inform whether assessment of effects on the NSA will be required.	This was provided through further consultation with NS as discussed in paragraph Error! Reference source not found. of Chapter 7 of the EIAR. The Knoydart NSA has been scoped out of the assessment in agreement with NS.
NS-14	Landscape and Visual - Cumulative Effects	We advise that cumulative effects on WLA 18 be included in the WLIA given existing and proposed man-made development surrounding Loch Quoich and the consequent high likelihood for cumulative effects. This should consider all elements of the proposal development i.e. access tracks, built form, dams and impoundments, and borrow pits. When considering which proposals to include within the cumulative assessment we consider that The Highland Council are best placed to advise.	Noted.
NS-15	Landscape and Visual - Lighting Requirements	Should there be a requirement for external lighting of the proposed development, we advise that effects from lighting on WLA 18 be considered, given predicted visibility of the proposal from this area and the high sensitivity of WLAs 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.	No operational lighting would be required as part of the Proposed Development so this is not required.
NS-16	Landscape and Visual - 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 downdraw 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 also show landscape mitigation proposals at year 1 and year 15.	Consideration of maximum and minimum drawdown levels as well as fluctuations between these levels has been considered in the assessment. Photomontages show drawdown at its half-way point as this is considered to be representative of the most commonly occurring scenario. (refer to the EIAR Chapter 7, paragraphs Error! Reference source not found. Error! Reference source not found.). Wirelines have been provided for the reservoir full and reservoir empty scenarios.
NS-16	Landscape and Visual - Additional visualisation location	Given predicted visibility, we would advise that an additional viewpoint from Sgurr Mhurlagain, be included for to ensure that all potential effects on WLA 18 are captured.	A photomontage from Sgurr Mhurlagain is included in the EIA Report as Figure V3a-8a-e and Figure V3b-8a-h .

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NS-17	Landscape and Visual - Mitigation	Demonstration of mitigation through design should be detailed in the submission; relating to reducing impacts on WLA 18. Given the proposals location within a landscape of high sensitivity to development we would like to see options explored throughout the design evolution of this proposal. This should 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 and are likely to be capable of being mitigated include: · New access tracks and any upgrading of exiting 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 we are not able at this stage to give detailed advice on, however to enable us to better understand the effects a series of sections and photomontages would assist us. As with any development of this scale proposed for within a WLA the scale, design and finish of the proposed development should reflect the high value of the landscape in which it is located; and · Powerhouse/ built form associated with the development. The proposals should 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-Knoydart-Morar WLA (WLA18).	Mitigation is discussed in the Chapter 7 of the EIAR at Section 7.8. Mitigation specifically relating to the WLA is discussed in Appendix 7.4 .
NS-18	Terrestrial Ecology	We agree with the scope of further surveys and assessments. We provide further advice through our standing guidance: https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species	Noted.
NS-19	Ornithology West Inverness-shire Lochs SPA and SSSI	The proposed pumped storage scheme is located around 6km from West Inverness-shire SPA and SSSI designated for black-throated diver and common scoter.	Noted.
NS-20	Ornithology proposed surveys generally agreed	In general we agree with the scope of the proposed surveys for birds and have the following advice for any application going forward:	All field surveys followed standard survey and monitoring guidance recommended by NatureScot and CIEEM for upland bird survey. Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR provides full methods for all field surveys undertaken.
NS-21	Ornithology - requirement to survey common scoter	Loch Fearnha could support nesting common Scoter. A pair were seen during the breeding season of 2023. It is not certain that the birds were nesting on the loch but it seems likely given the time of year they were surveyed. In section 10.4.4 of the scoping report the applicant recommends monitoring of common scoter. However, we advise that this monitoring must be continued to enable a full assessment to be undertaken.	Monitoring of the scoter has been ongoing since 2022, and there are plans to continue this monitoring on an annual basis. Results of species-specific surveys can be found in Appendix 10.2 - Ornithology – Field Survey Methodology.
NS-22	Ornithology - SAR preferred	We are pleased note that the applicants preferred access route will be the 'Southern Access Route'(SAR).	Noted.
NS-23	Ornithology - EIA to cover	Other alternative access routes could lead to a very significant, and possibly long-term, disturbance issue from cumulative impacts on West Inverness-shire Lochs SPA, with access potentially being taken on the C1144 public road, from Invergarry. This route runs alongside the SPA. This, in	The EIAR Chapter 10 – Ornithology takes into account potential ornithological impacts for all potential access routes, however, the

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	C1144 access also	combination with other construction and access projects, including Skye OHL Reinforcement Project and Coire Glas Grid Connection Project and their associated infrastructure improvements, could lead to significant disturbance to any birds nest on or near the SPA. Therefore, given that the alternative access option could lead to significant, and possibly long-term, disturbance the proposed assessments should cover all access options.	assessment concentrates on the design and layout as presented in the EIAR Chapter 2: The Proposed Development . A detailed assessment of effects on the West Inverness-shire Lochs SPA, which is both functionally and hydrologically linked to the Proposed Development, is provided in a separate shadow HRA.
NS-24	Ornithology - Cumulative impact of access arrangements	In addition, the should the application goes forward with Invergarry C1144 access option, the assessment should include the cumulative impact assessment 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.	Noted – use of the C1144 for construction access is not included in the Proposed Development.
NS-25	Ornithology - adverse effect on SPA would lead to objection	Should we be unable to conclude that the proposal will have no adverse effects on the integrity of West Inverness-shire Lochs SPA, we will object to the application.	Noted.
NS-26	Geology, Soils and Water	We know from other schemes of this nature that the grid connection and spoil from tunnel operations can have the potential to raise further impacts. Therefore, we advise that detail of the grid connection and spoil management is fully detailed in any application going forward. We advise that the applicant follows our detailed guidance on peatland, carbon-rich soils and priority peatland habitats: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management	The Proposed Development would not create an excess of material, with all material proposed to be used on site. Refer to Appendix 2.3 – Mass Balance Strategy and Borrow Pit Plan . The grid connection will be subject to a separate planning application by SSE Networks.
HES-01	HES remit assets not impacted so can be scoped out of EIA	We can confirm that it is unlikely that the proposals will impact on any assets within our remit, and we are therefore content for our historic environment interests to be scoped out of any subsequent Environmental Impact Assessment.	Noted – cultural heritage has been scoped out of the EIA on the basis of this and an equivalent response from the Highland Council Historic Environment Team.
HES-02	Local Authority to review assets not covered by HES	The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B and C listed buildings.	Noted.
TS-01		Transport Scotland would state that that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager. At this scoping stage, it would be helpful to contact the Area Manager for the A87(T), who is David Devine and who can be contacted at david.devine@transport.gov.scot.	Noted. A meeting has been held with David Devine at Transport Scotland to discuss the potential known changes to the trunk road network and these are considered in the EIAR at Chapter 15 – Transport and Access . Any additional changes identified through the application process will be discussed at the appropriate time.
TS-02		We would ask that at the application stage, 1:500 drawings of any new or modified junctions are submitted for review by Transport Scotland including visibility splay plans. There may also be a need for a Stage 1 Road Safety Audit depending on what is proposed.	Drawings of the junction of the A87 and the SAR are included in the EIAR at Chapter 15 - Transport and Access . The Applicant would be

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			happy to arrange a Stage 1 RSA in due course as required.
TS-03	Assessment of Environmental Impacts	Chapter 14 of the SR presents the proposed methodology for the assessment of Transport and Access. This states that the Transport & Access EIA Report Chapter will be supported by a Transport Assessment report and Abnormal Load Route Survey. We note that the Guidelines proposed to inform the assessment are the Guidelines for the Environmental Assessment of Road Traffic (Institute of Environmental Assessment (IEA), 1993).	Noted. The assessment in the EIAR at Chapter 15 – Transport and Access has been undertaken in line with the outlined methodology.
TS-04	New IEMA Guidance	Transport Scotland would note that new guidance has been published by the Institute of Environmental Management and Assessment (IEMA). These Guidelines, entitled Environmental Assessment of Traffic and Movement (July 2023), are intended to update and replace the previous 1993 guidelines and provide enhanced and up to date advice on the assessment of traffic and movement.	Noted. The assessment in the EIAR at Chapter 15 – Transport and Access has been undertaken in line with the outlined methodology.
TS-05	Guidelines to be used as Screening Process	Transport Scotland would request that the thresholds as indicated within these new Guidelines be used as a screening process for the assessment. These specify that road links should be taken forward for further assessment where the following two rules are breached: Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%) Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more. •Chapter 14 indicates that the study area will include: •C1144 between the site access junction and its junction with the A87(T); •The A87(T) between Invergarry and Bunloyne Bridge; •The A887(T) between Invermoriston and Bunloyne Bridge; •The A82(T) between Fort William and Invermoriston. •The A830(T) between Corpach and Fort William;	Noted. The assessment in the EIAR at Chapter 15 – Transport and Access has been undertaken in line with the outlined methodology.
TS-06	Use of DfT and Traffic Scotland Databases	We note that the DfT and Traffic Scotland databases will be utilised to inform the baseline, with ATC surveys being undertaken at the following locations: •The C1144 at the site access junction; •The A87(T) at its junction with the C1144; and •The A887(T) in Invermoriston. In addition, we note that future year traffic growth will be obtained by using National Road Traffic Forecast (NRTF) Low growth estimates. Transport Scotland is satisfied with this approach.	Noted.
TS-07	Abnormal Loads Assessment	Chapter 14 states that an Abnormal Load Route Survey (ALRS) will be prepared. In this, the worst-case load would be assessed which is likely to access the site from the Port of Inverness to site via barge access on Loch Ness and then via the A82(T) (from a lochside landing north of Fort Augustus), A87(T) and the preferred SAR. An alternative route from the Port of Corpach is also being considered. Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected trunk road route and that their transportation will not have any detrimental effect on structures within the trunk road route path. The ALRS should identify key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.	The proposed AIL delivery route (Access Route) is presented as part of the Route Survey Report (RSR) as an Annex to the EIAR Chapter 15 - Transport and Access . The assessment includes the worst-case loads from the proposed Port(s) of Entry (PoE).

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SF-01	Avoidance of woodland removal	The first consideration for all woodland removal decisions should be whether the underlying purpose of the proposals can reasonably be met without resorting to woodland removal. Scottish Government's Policy on Control of Woodland Removal clearly sets out a strong presumption in favour of protecting Scotland's woodland resources. https://forestry.gov.scot/support-regulations/control-of-woodland-removal	Noted. The design of the Proposed Development includes only unavoidable removal of woodland, but it cannot be built without some areas of woodland removal, almost all of which is plantation forestry.
SF-02	Avoidance of woodland removal	In line with Scottish Government's wider objective to protect and expand Scotland's woodland cover, applicants are expected to develop their proposal with minimal woodland removal. Woodland removal should be allowed only where it would achieve significant and clearly defined additional public benefits.	Noted. The design of the Proposed Development includes only unavoidable removal of woodland, which is plantation forestry. The Fearna PSH will deliver clearly defined additional public benefits. This energy storage solution would be a key component for reaching Scotland's ambitious climate change legislation target date for net zero emissions of all greenhouse gases by 2045.
SF-03	Criteria for acceptability of woodland removal	The following criteria for determining the acceptability of woodland removal should be considered relevant to this application – · Woodlands with a strong presumption against removal. Only in exceptional circumstances should the strong presumption against woodland removal be overridden. Proposals to remove these types of woodland should be judged on their individual merits and such cases will require a high level of supporting evidence. Where woodland removal is justified, the Compensatory Planting (CP) area must exceed the area of woodland removed to compensate for the loss of environmental value. Woodland removal with a need for compensatory planting - Design approaches that reduce the scale of felling required and/or converting the type of woodland to another type (such as from tall conifer plantation to low-height, slow growing woodland), must be considered from the earliest stages, rather than removing the woodland completely. The purpose of any required CP is to secure, through new woodland on site (replanting) or off site (on appropriate sites elsewhere), at least the equivalent woodland-related net public benefit embodied in the woodland to be removed.	The area of proposed compensatory planting will exceed the area of woodland removal by a substantial margin. This is assessed in the EIAR in Chapter 9 – Forestry .
SF-04	NPF4 themes	National Planning Framework 4 - Policy 6 Forestry, Woodlands and trees identifies several themes that should be considered relevant to this application – b) Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value, or identified for protection in the Forestry and Woodland Strategy; iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy; d) Development proposals on sites which include an area of existing woodland or land identified in the Forestry and Woodland Strategy as being suitable for woodland creation will only be supported where the enhancement and improvement of woodlands and the planting of new trees on the site (in accordance with the Forestry and Woodland Strategy) are integrated into the design.	The Proposed Development utilises an existing access track through the Garry Forest which passes through areas of AWI and Caledonian pinewood. The impacts of this are assessed in the EIAR, Chapter 9 – Forestry .
SF-05	Application of guidance	Scottish Forestry welcomes the developer's commitment within the Scoping Report to ensure that any proposed changes to woodland address the requirements of the Control of Woodland Removal Policy and other relevant guidance	Noted.

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SF-06	Dedicated forestry chapter	Scottish Forestry suggest a dedicated chapter on Forestry would be appropriate. The approach to the EIA process in terms of Forestry is appropriate and will identify sensitivities and present mitigations against impacts.	The EIAR contains a dedicated chapter on forestry, Chapter 9 – Forestry .
SF-07	Presumption against removal of certain woodland types	Due to the length of the access track and the references realignment, widening and new road section suggests that many woodland types may be impacted by the development. The policies set out in the response indicate that there are certain woodland types for which there is a presumption against removal and NPF4 sets out the woodland types where removals will not be supported.	The Proposed Development utilises an existing access track through the Garry Forest which passes through areas of AWI and Caledonian pinewood. The impacts of this are assessed in the EIAR, Chapter 9 – Forestry .
SF-08	Glen Garry Pinewood Inventory site and Fearna Ancient Woodland Inventory site	The scoping report indicates potential significant impacts on Ancient Semi Natural Woodland and the Glen Garry Pinewood Inventory site, which is a Priority Biodiversity Action Plan habitat. There are also native woodlands indicated in the gorge leading from Loch Fearn and an Ancient Woodland Inventory site. There will be a strong presumption to avoid impacts on these sites and alternative routes or measures should be considered.	The road upgrades have been designed in close consultation with FLS to avoid any impact on mature Caledonian pines. Details of this are included in the EIAR at Chapter 9 – Forestry .
SF-09	Include priority BAP sites in the EIAR	Priority Biodiversity Action Plan habitats should be included in the scope of the EIA report.	For woodland habitats, these are assessed in the EIAR at Chapter 9 – Forestry .
SF-10	CoWRP guidance	Scottish Government's policy on control of woodland removal: implementation guidance February 2019 https://forestry.gov.scot/support-regulations/control-of-woodland-removal provides guidance on the level and detail of information Scottish Forestry will expect within the EIA Report, to help us reach an informed decision on the potential impact of the proposed development.	Noted. The information provided in the EIAR at Chapter 9 – Forestry meets the requirements of this guidance.
SF-11	Details of proposed felling and compensatory planting	The developer must include detailed information on the types and areas of forestry to be felled and restocked as a result of the proposed development. Detailed information on any compensatory planting proposals should also be provided. All felling, restocking and compensatory planting proposals must be compliant with the UK Forestry Standard. https://forestry.gov.scot/sustainable-forestry/ukfs-scotland	This information is provided in the EIAR at Chapter 9 – Forestry .
SF-12	Additional felling not covered by planning application	Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). For areas covered by an approved Long Term Forest Plan (LTFP), the request for additional felling (and subsequent restocking) areas needs to be presented in the form of LTFP amendment. https://forestry.gov.scot/support-regulations/felling-permissions	Noted. No additional felling is proposed beyond that included in the application.
SF-13	Guidance for compensatory planting	The applicant should note that any compensatory planting required as a result of the proposed development, may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. https://forestry.gov.scot/support-regulations/environmental-impact-assessment and should follow the process for preparing a woodland creation proposal, as set out in our guidance booklet: Woodland Creation Application Guidance. https://forestry.gov.scot/support-regulations/woodland-creation	Noted. It is proposed that these consents would be sought following granting of the Section 36 consent.
BT-01	BT point-to-point microwave radio links	The conclusion is that proposed development should not cause interference to BT's current and presently planned radio network.	Noted.
DIO-01	MOD Safeguarding – Tactical	The application site falls within part of the UK Military Low flying System designated Tactical Training Area 14T (TTA 14T), an area within which fixed wing aircraft may operate as low as 100 feet or 30.5 metres above ground level to conduct low level flight training. The introduction of a new building or	If aviation safety lighting is required for the design presented in the EIAR, it is proposed that this would be infrared lighting.

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	Training Area 14T (TTA 14T)	structure with a height above ground of 15m or greater in this location, along with the significant changes to the surrounding landscape and increase in water levels has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address the impact up on low flying given the location and scale of the development, the MOD would require that conditions were added to any consent issued requiring that the development is fitted with aviation safety lighting, and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.	This is addressed in the EIAR at Chapter 13 – Land Use .
CES-01	Not affected	I confirm that the assets of Crown Estate Scotland are not affected by this proposal.	Noted.
NDSFB-01	Concerns re potential temperature changes	One of Ness DSFB's main concerns is that PSH schemes have the potential to affect water temperatures in both the upper and lower reservoirs (Bonalmi, et.,al, 2012, Harby et al., 2013). PSH has the potential to influence water temperatures through frictional losses during generation and pumping, and by solar radiation transfer e.g. when an empty upper reservoir is filling on a sunny day, and to disrupt thermocline formation and stability. Thermal changes could occur in the opposite direction when upper reservoirs are filled during cold weather. The potential for thermal impacts are high for the Fearna Scheme due to the size of the scheme in relation to the lower reservoir volume. The estimated maximum volume of Loch Quoich is 658M m3 (when reservoir full), and the Fearna Scheme has the capacity to pump 40Mm3 over a 24hour period. This is equivalent to 6.1% of the volume of Loch Quoich, meaning that the entire volume of Quoich could be turned over in 16 days. Loch Quoich is rarely full so in reality the turnover time is likely to be less than 14days. Due to the complex topography of Loch Quoich, with potentially limited internal circulation, water close to the offtake will be subject to repeated pumping and generation cycles, potentially resulting in enhanced localised temperatures changes.	Long-term temperature monitoring of Loch Quoich is being carried out at two locations, with loggers placed at different water depths at each location. An assessment of the effects of temperature changes associated with the Proposed Development is discussed within EIAR Chapter 11: Aquatic Ecology .
NDSFB-02	Concerns re potential temperature changes	Concerns about temperatures in Loch Quoich stem from the fact that despite good habitat, and a diverse and abundant invertebrate population, the Gearr Garry (effluent river from Loch Quoich) remains effectively salmon less. Ness DSFB have been investigating why, and one potential cause may be water temperatures. The entire flow in the Gearr Garry is derived from compensation flows delivered through a valve drawing from the bottom of Loch Quoich. The temperature profile many metres below the reservoir surface is likely to be quite different to those at the surface of the reservoir, in particular during periods when the loch is stratified. Monitoring in autumn 2022 found that water temperatures in the Gearr Garry remained too high for successful salmon spawning throughout the normal spawning season. Subsequent monitoring in autumn 2023 found that the high temperatures of the previous year were not repeated. This may cast doubt on the veracity of the 2022 data however, autumn 2023 was much cooler than the previous year. In order to understand this issue, we would expect the developers to commission a study to report on potential impacts of the Fearna scheme on the water temperature profile of Loch Quoich, and on the temperature profile of the compensation flow in the Gearr Garry.	Long-term temperature monitoring is being carried out on the Gearr Garry simultaneously with the temperature monitoring being carried out on Loch Quoich. This has informed effects of the compensation flow from Loch Quoich on temperature in the Gearr Garry and also the effect of the Quoich Power Station outflow on temperature in the Gearr Garry. An assessment of the effects of temperature changes associated with the Proposed Development is discussed within EIAR Chapter 11: Aquatic Ecology .
NDSFB-03	Surface water intake suggestion	Mitigation measures for this issue could include the installation of a surface water intake for the compensation flow delivered to the Gearr Garry. The design and installation of such a device should be well within the engineering capabilities of the Fearna PSH scheme and could result in significant benefits to the ecology of the Gearr Garry.	Mitigation for temperature effects has been informed by the results of the temperature monitoring work and are reported in EIAR Chapter 11: Aquatic Ecology .

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NDSFB-04	BNG opportunities	Under National Planning Framework 4, all major developments such as PSH have to demonstrate that “the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention”. For some proposed PSH schemes this will be challenging, but for Fearna PSH there are many opportunities for net biodiversity gain (NBG), including addressing long-standing impacts of the 1950s conventional hydro scheme on salmon. The redesign of the Gearr Garry compensation flow intake, so that it is fed from the loch surface, rather than the base of the dam, is one NBG opportunity, but there are many others. Opportunities include riparian tree planting in upper Garry tributaries, “trap and truck” of salmon smolts from the upper Garry to by-pass Invergarry Dam, the modernisation of downstream smolt passage at Invergarry Dam (to provide another option than having to go through the generation tunnel, turbines, and tailrace), the provision of downstream passage for post-spawning salmon (kelts) and improved sediment management downstream of hydro impoundments.	Biodiversity net gain opportunities associated with terrestrial ecology are discussed in the EIAR, Chapter 8 – Terrestrial Ecology at Section 8.12: Biodiversity Enhancements are detailed further in Appendix 8.7: OBEMP . Biodiversity net gain opportunities associated with ornithology and freshwater ecology are also discussed in Chapter 10 – Ornithology and Chapter 11 - Aquatic Ecology .
NDSFB-05	Design of SAR	Para 1.2.5: The preferred access route for the Fearna PSH development, the Southern Access Route (SAR), crosses most of the Upper Garry tributaries, including the River Kingie and Gearr Garry. Many of these tributaries support salmon populations, although often restricted to the lower reaches. The Kingie and Gearr Garry, are core salmon habitat. The development of SAR will require considerable upgrades to existing forestry tracks, involving many new river crossings. Fish migration issues, and the ongoing management of road run-off, will require careful design and construction, as well as monitoring.	Effects relating to the SAR are assessed under construction phase effects within EIAR Chapter 11: Aquatic Ecology . A Construction Environmental Management Document (CEMD) which would include a Pollution Prevention Plan (PPP), Dust Mitigation Plan and Surface Water Quality Monitoring Programme (SWQMP) would be implemented by the Principal Contractor and best practice measures will be overseen by a suitably experienced Ecological Clerk of Works (ECOW). A water quality sampling programme would be designed to cover likely present pollutants and undertaken at a timescale to allow sufficient actions to be taken in the case of pollution incidents. Aquatic elements will be incorporated into the Construction Noise and Vibration Management Plan (CNVMP) to ensure noise and vibration limits are not in excess of limits capable of causing injury and/or mortality to fishes.

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NDSFB-06	Construction compound	Para 1.2.6: The construction of a temporary storage and accommodation compound along SAR has the potential to introduce considerable industrial, social and domestic, pressure to an otherwise uninhabited tract of land. A potential location of this compound was presented to Ness DSFB during an earlier discussion with the developers. The proposed location was on the ridge to the north west of Lochan an Staic. This location is remote, but close to the upper reaches of the River Garry, its lochs and tributaries. Ness DSFB would like to see more detail regarding this proposed compound, including management of waste, access and social issues.	Effects on Arctic charr within Loch Quoich are discussed in EIAR Chapter 11: Aquatic Ecology. Ness DSFB confirmed via more recent correspondence (20/08/2024) that they are satisfied Loch Fearna is 'fishless'. Initial eDNA survey results are included within Appendix 11.1 - Fearna Aquatic Ecology Surveys.
NDSFB-07	Clarification re DSFB jurisdiction	Para 2.2.2: Lochaber District Salmon Fishery Board and the Lochaber Fisheries Trust are listed as consultees. This is incorrect as the Fearna PSH scheme falls entirely within the jurisdiction of the Ness DSFB, and Ness & Beaully Fisheries Trust.	Effects on Macroinvertebrates are discussed in EIAR Chapter 11: Aquatic Ecology. Macroinvertebrate indices are provided in the Appendices: Appendices: 11.1 - Fearna Aquatic Ecology Surveys and 11.2 - Southern Access Route (SAR) Aquatic Ecology Surveys. A comprehensive suite of biotic indices for each survey location provides: • BMWP - Biological Monitoring Working Party Score • NTAXA (TL1 and TL2) - Count of BMWP family taxa in the sample • ASPT (TL1 and TL2) - Average score per (BMWP/WHPT) taxon • LIFE (TL5 and TL2) - Lotic-Invertebrate index for Flow Evaluation • PSI (TL5 and TL3) - Proportion of Sediment-sensitive Invertebrates • E-PSI (FAM and TL5) - Empirically Weighted Proportion of Sediment-sensitive Invertebrates Index • CCI (TL5) - Community Conservation Index (TL5 only) • WHPT (TL2) - Whalley-Hawkes-Paisley-Trigg index

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NDSFB-08	Fish assessments	Para 11.1.3 Ness DSFB welcome the detailed fish assessment carried out in 2023. This needs to include eDNA profiling of Loch Fearn, and Quoich, to establish the species present. Long-term monitoring will need to be established to understand the impact of the scheme on fish populations present within the lochs, such as the Arctic charr population in Loch Quoich. Monitoring of Arctic charr, with sufficient power to be able to detect changes in population status, will require careful design and implementation.	The developer has sought expert guidance from Dr Nathan P. Griffiths, one of the authors of the lead authors of CREW paper for the most appropriate survey methodologies in relation to eDNA as well as Professor Colin Adams, an expert in Arctic charr ecology for further advice.
NDSFB-09	Invertebrate diversity indices methodology	Para 11.5.1 We are not familiar with the invertebrate diversity indices provided. This section is confusingly written. We suspect the diversity indices are actually abundance figures, and that the taxonomic definitions provided in 11.5.2 are incorrect. We expect the issue of invertebrates to be handled with much great clarity and accuracy, in the EIA.	Effects relating to the SAR are assessed under construction phase effects within EIAR Chapter 11: Aquatic Ecology. A Construction Environmental Management Document (CEMD) which would include a Pollution Prevention Plan (PPP), Dust Mitigation Plan and Surface Water Quality Monitoring Programme (SWQMP) would be implemented by the Principal Contractor and best practice measures would be overseen by a suitably experienced Ecological Clerk of Works (ECOW). A water quality sampling programme would be designed to cover likely present pollutants and undertaken at a timescale to allow sufficient actions to be taken in the case of pollution incidents. Aquatic elements will be incorporated into the Construction Noise and Vibration Management Plan (CNVMP) to ensure noise and vibration limits are not in excess of limits capable of causing injury and/or mortality to fishes.
NDSFB-10	Recommended use of CREW methodology for fish population assessment	Para 11.8.1 The Centre of Expertise for Water (CREW) recently organised a workshop on Methodologies for Sampling Fish Populations in Scottish Freshwater Lochs. The report from this workshop will be published in the near future. This report should guide the fish population assessment and monitoring requirements for the Fearn PSH.	Effects on Arctic charr within Loch Quoich are discussed in EIAR Chapter 11: Aquatic Ecology. Ness DSFB confirmed via more recent correspondence (20/08/2024) that they are satisfied Loch Fearn is 'fishless'. Initial eDNA survey results are included within Appendix 11.1 - Fearn Aquatic Ecology Surveys.

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NDSFB-11	Effects on inundated peat deposits	Para 12.3.1 The construction and operation of the Proposed Development has the potential to impact peat deposits. Regular cycles of inundation, and draining, which are normal features of PSH operation will degrade and destroy peat, and other soil deposits, within the inundation area of the upper reservoir. What management is proposed for peats and soils in the inundation zone? Will peats be stripped from this area, for re-use elsewhere? Non-removal means that degraded peats and soils would fragment and be entrained within pumped water, potentially polluting Loch Quoich. Ness DSFB request that the EIA details how peat/erodible soil deposits within the inundated area of the upper reservoir will be managed.	Effects on soils and peat, including those in the proposed inundation area, are discussed in full in Appendix 12.1 - PLHRA and 12.2 - PMP and summarised in Section 12.6 and Section 12.8 of Chapter 12 – Geology, Soils and Water . Details of peat re-use and habitat restoration is provided in Appendix 12.2 - PMP and at Appendix 8.7 - Outline Biodiversity Enhancement and Management Plan . The vast majority of peat would be removed from the Fearna reservoir inundation area as part of the creation of the borrow pits to generate rock to build the dams. This is described in Chapter 2: The Proposed Development .
NDSFB-12	Water temperature changes	Para 12.3.1 The Scoping report does not list potential changes in water temperature as a potential significant effect during operation. Ness DSFB disagree and request that a comprehensive study be commissioned to investigate the potential for water temperature changes in the upper, and lower reservoirs, and efferent river. This study should consider long and short-term changes, and the implications of climate change. Dependent on the study findings, regulatory guidance may need to be development to manage PSH thermal impacts.	Potential impacts and good practice to prevent potential thermal stratification are outlined in Section 12.8 of Chapter 12 – Geology, Soils and Water . As part of the detailed design stage of the project a Controlled Activity Regulations (CAR) application will be made to the Scottish Environment Protection Agency (SEPA) for operation of the PSH. This application will contain detailed information regarding operation and record keeping required to confirm that the movement of water between the upper and lower reservoirs does not have an impact on water and fishery resources. Details of the proposed water management is outlined in Chapter 6 - Hydrology and Water Management . Long-term temperature monitoring of Loch Quoich and the Gearr Garry is being carried out simultaneously. This will inform an assessment of the effects of the Proposed Development. An assessment of the effects of temperature changes associated with the Proposed Development are discussed within EIAR Chapter 11: Aquatic Ecology .
NDSFB-13	Water quality monitoring	Para 12.4.6 Ness DSFB agree that water quality monitoring will be required prior to, during and post construction if the project were it to be granted planning permission, and this would be specified in the	Noted.

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		assessment. However, adequate baseline data must be gathered so that changes arising from the Fearna PSH scheme can be assessed. Water quality includes physio-chemical characteristics such as thermal status. It is important that water temperate data from within Loch Quoich, and in the efferent Gearr Garry, is collected for an adequate period of time pre-construction, so that natural inter-annual variation can be established.	Monitoring is proposed and will be undertaken prior to, during and post construction. This would be stipulated within a Water Quality Monitoring Plan agreed with consultees.
NDSFB-14	Woodland restoration opportunities	Para 18.2.4 Restoration or enhancement of the many ancient woodland sites in proximity to the scheme provide biodiversity net gain opportunities.	Noted and included in the EIAR Appendix 8.7-OBEMP .
NDSFB-15	Timing of construction drawdown of Loch Quoich	19.4.4. Ness DSFB understand that SSER are joint venture partners with Gilkes in the development of the Fearna PSH scheme. As such we could expect there to be close cooperation between the operation of the existing Quoich Hydro scheme and the proposed Fearna PSH scheme. We note that a temporary drawdown on Loch Quoich may be required to allow the installation of the lower inlet/outlet structure within Loch Quoich. Maintenance of the existing compensation flow arrangements are essential for the ecology of the upper Garry. Due to hydro regulation, natural flow variability in the downstream catchment has largely disappeared. Consequently, generation at Quoich Power station, and Invergarry PS, are highly significant for the sustainability, and viability, of salmon fisheries in the River Garry and Oich. A compounding factor here is abstraction by the Caledonian Canal, at both Culloch locks and at the Laggan end of Loch Oich, which reduces the flow in the River Oich. The Garry & Oich, are mainly spring fisheries and low flows this spring, in particular, have a severe impact on those fisheries. The most critical time for flows for these fisheries is the spring period Feb to May, as this is when most of the salmon population run into that part of the catchment.	A temporary drawdown of Loch Quoich would be required to establish temporary works for the construction of the lower control works. During the drawdown period, compensation flows to the Gearr Garry would be maintained. The timing of the drawdown would be planned to avoid low flows downstream of the Quoich dam during the sensitive salmon running period of February to May. As the details of the temporary drawdown are developed with the Main Contractor, there would be close liaison between them, the operators of the Quoich and Invergarry hydro schemes (SSER) and the Ness District Salmon Fishery Board. This is included in the EIAR at Section 2.7 of Chapter 2 – The Proposed Development .
NDSFB-16	Effect of river flows on protecting fisheries	The issue of water management, in particular low river flows in the spring (and their impact on the fishery) and the apparent diminution of one of the founding principles of “protecting fisheries”, have been discussed at length during liaison meetings between Ness DSFB and SSER. The original Act of Parliament which established SSE’s predecessor company in 1943 included: ‘The Board should have regard to avoiding as far as possible, injury to fisheries and to the stock of fish in any waters.’	Noted, and assessed in EIAR Chapter 11: Aquatic Ecology .
NDSFB-17	Timing of construction drawdown of Loch Quoich	In order to avoid any additional stress on the availability of water in the spring Ness DSFB request that if a temporary drawdown on Loch Quoich is required to allow the installation of the lower inlet/outlet structure in the loch, then this should not occur in the spring. The most natural period for such a drawdown would be the summer.	See NDSFB-15 above.
NDSFB-18	Mitigation for wild salmon	Considering the statements made within the recently published Scottish Wild Salmon Strategy https://www.gov.scot/publications/scottish-wild-salmon-strategy/ it is clear that the Scottish Government considers the iconic Scottish Wild salmon to be in crisis. The downstream impacts of the proposed Fearna PSH on the Garry/Ness salmon populations need to be fully understood, and mitigated if required.	No anticipated likely effects on Atlantic salmon from the construction / operation of the Fearna PSH. Effects on Atlantic salmon relating to the Southern Access Route (SAR) are assessed in EIAR Chapter 11: Aquatic Ecology .
MS-01	Summary of concerns	Mountaineering Scotland's concern at this stage is ensuring that the proposed viewpoints will allow a comprehensive assessment of the proposed development from a mountaineering perspective, and that popular recreational access routes are identified and managed should an application be made.	Visualisation locations have been agreed with THC and NatureScot and chosen to show a representation of elevated and lower level views, located on the minor road and recreational routes within the study area.

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			Recreational routes within the study area which have potential for effects have been included within the visual assessment in the EIAR (see Appendix 7.2 , and Section 7.10 of Chapter 7 – Landscape and Visual).
MS-02	Summit visualisation locations agreed	We support the Proposed Visualisation Locations indicated in Figure 5.1. The three mountain summit viewpoints adequately represent hillwalking destinations in the surrounding area.	Noted.
MS-03	MS request involvement in development of diversion routes and additional visualisations from this route	Hillwalkers generally make a round of Gleourach and Spidean Mialach in a clockwise direction from a parking area beside the single-track road along Loch Quoich. The Munro Guide indicates the descent from Spidean Mialach follows "...a path southwest down easy slopes, leading towards a point about 400m north of Loch Fearna...". This route between the summit and the parking area would be severed by the proposed Coire Dubh Dam. We request the applicant to indicate how they propose to manage mountaineering access around the inundation area, and the visual impact of the diversion. This may require a further series of visualisations from where the path is severed by the proposed dam, and from points along any suggested alternative diversionary routes. Mountaineering Scotland request involvement with the development of any diversionary route proposed to assess its feasibility for walkers taking in the round of the two Munro summits.	Engagement has been undertaken with Mountaineering Scotland and the THC Access Officer with regards to the management of access for users of recreational routes. This is discussed in Chapter 14 - Recreation and Access and Appendix 14.1 – Draft Outdoor Access Management Plan . A detailed assessment of the visual effects on the diverted mountain route to Spidean Mialach and Gleouraich is included in the EIAR at Appendix 7.2, Annex A. Additional visualisations are presented in Chapter 14 - Recreation and Access .
MS-04	Access Management Plan required, showing minimisation of constraints	We expect the applicant to make clear in an Access Management Plan the generally accepted principle that any constraints on access would be of minimal extent and minimal duration to achieve the work safely, and that it is accepted that these parameters may change location during the different phases of construction.	This principle is recognised in the EIAR Appendix 14.1 - Draft Outdoor Access Management Plan .
NATS-01	No safeguarding objection	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	Noted.
RSPB-01	RSPB key concerns	We are concerned that the proposed development would have a significant impact on the West Inverness-shire Lochs SPA and SSSI, both designated for breeding Common Scoter and Black-throated Diver. Not only are these designated sites hydrologically connected to the development via Loch Quoich and the River Garry, but also located at Loch Fearn, an outlying site from the SPA/SSSI, supporting a meta-population of rare Common Scoter. Loch Fearn is therefore functionally linked to this nationally and internationally designated wildlife site and is likely to affect the sites and qualifying species. Following review of the scoping report, we are also concerned about the scale of predicted loss of Annex 1 habitats of international importance.	The EIAR Chapter 10 - Ornithology and Appendix 10.2 - Ornithology – Field Survey Methodology provide baseline survey methods, results and analysis for birds and ornithological designations, including the West Inverness-shire Lochs SPA. Other biota, habitats and ecological designations are similarly covered in Chapter 8: Terrestrial Ecology , Chapter 9: Forestry and Chapter 11: Aquatic Ecology .
RSPB-02	Designated Sites and Birds	From the information available at this stage, it appears that there would be likely significant effects on the qualifying interests of the West Inverness-shire Lochs Special Protection Area (SPA) from the proposed development alone or in combination with other projects. Therefore, the EIA Report must	The EIAR Chapter 10 - Ornithology provides an assessment on those species and

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	of Conservation Concern	include sufficient information to inform an Appropriate Assessment, as required by the Conservation of Habitats and Species Regulations 2017.	designations considered likely to suffer impacts from The Proposed Development. A detailed assessment of effects on the West Inverness-shire Lochs SPA, which is both functionally and hydrologically linked to the Proposed Development, is provided in a separate shadow HRA.
RSPB-03	The importance of Loch Fearn to Common Scoter	RSPB have been aware of the presence of Common Scoter on Loch Fearn since 2019, with a maximum of two pairs and two single males recorded in 2022. However, according to our records, the loch annually supports one pair. Since the species has strong site fidelity, we expect that this has been a traditional site supporting them for many years. It is therefore concerning that no Common Scoter were recorded during ornithological surveys in 2022 (section 10.2.4). Common Scoter can be particularly elusive when breeding, and surveys must be intensive and timed precisely to ensure presence and breeding behaviour are recorded. Indeed, the males will disappear from breeding lochs in June while females attend the nest, and this is a time when their presence can be easily missed. Further detail is provided in the Survey Methodology section below. We also note that although birds were recorded on Loch Fearn in 2023 by surveyors contributing to the EIA, "no evidence of breeding was determined." RSPB Scotland has not confirmed productivity at this site as we have not been able to provide enough survey coverage at the correct time of year. However, the fact that one pair is consistently recorded using the loch annually during the breeding season and courtship display has been observed suggests that they do breed at this site, likely using areas of dry and montane heath habitats surrounding the loch to nest.	This point is addressed in the EIAR Chapter 10 – Ornithology and associated Appendices.
RSPB-04	The importance of Loch Fearn to Common Scoter	Although not a component loch of the West Inverness-shire Lochs SPA, being situated in the wider Garry catchment suggests the birds using Loch Fearn are a meta-population of the wider SPA population. Furthermore, monitoring data suggests that one of the pairs recorded on Loch Fearn in May 2022, may have then moved to Loch Loyne (an SPA loch). The SPA currently holds 25-30% of the GB breeding population of Common Scoter (only 52 pairs in total according to the most recent national survey), which is classed as 'unfavourable declining.' The SPA is covered by a multi-partner initiative known as the West Inverness Glens Nature Restoration Project to address these significant population declines. The pair at Loch Fearn therefore represents a significant proportion of both the SPA and UK breeding population. We believe that the loch is particularly healthy and suitable for these birds because of the lack of fish due to its inaccessibility to them (and hence reduced competition for invertebrate food sources) and lack of disturbance. This is supported by the information provided in section 11.5.1 of the Scoping Report which states that a Macroinvertebrate Population Assessment found a high diversity in Loch Fearn compared to Loch Quoich.	This point is addressed in the EIAR Chapter 10 – Ornithology and associated Appendices.
RSPB-05	Wider-countryside birds	There are also other species that are listed on Schedule 1, Annex 1 and/or red or amber listed Birds of Conservation Concern ¹ , including White-tailed Eagle, Golden Eagle, Osprey, Peregrine, Merlin, Red-throated Diver, Black-throated Diver, Greenshank, Black Grouse, Ptarmigan, Crossbill, Ring Ouzel and Snipe which are present in the area and could be affected by the development. We would recommend that the Applicant submits a data request to RSPB Scotland and the Highland Raptor Study Group to inform the ornithological desk study.	Data requests were supplied by the Highland Raptor Study Group (HRSG) and the RSPB, and both were used to inform the desk study. The EIAR Chapter 10 – Ornithology and Appendix 10.2 – Ornithology – Field Survey Methodology provide baseline survey methods,

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			results and analysis for all bird species recorded during the survey period.
RSPB-06	Survey Methodology - General	A scoping exercise should help inform survey design, and we are disappointed to note that almost two years of ornithological surveys have already been undertaken prior to this exercise as outlined in section 10.2.2. We have a number of concerns with the bird survey work undertaken to date as outlined below. In addition, although a brief summary of methods and findings is presented in the Scoping Report, no detailed results or maps of survey areas have been presented, making it very difficult to comment on the adequacy of coverage. It is also concerning that no other survey work within the proposed area of works, or specific-species monitoring, is considered necessary (section 10.4.3), despite the fact that not all locations of components e.g., the temporary construction and accommodation compounds have been finalised. However, we understand that surveys of the preferred Southern Access Route (SAR) will commence in 2024 and recommend that the temporary construction and accommodation compound areas are included in this. All bird and habitat surveys should adequately cover (with suitable buffers) all permanent and temporary construction and operational infrastructure areas.	All field surveys followed standard survey and monitoring guidance recommended by NatureScot and CIEEM for upland bird survey, including sufficient buffers. Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR provides full methods for all field surveys undertaken. Monitoring of the scoter has been ongoing since 2022, and there are plans to continue this monitoring on an annual basis. Results of species-specific surveys undertaken so far can be found in Appendix 10.2 - Ornithology – Field Survey Methodology.
RSPB-07	Survey Methodology - Breeding bird surveys	NatureScot does not have specific standard survey guidance for hydro schemes, but it does for wind farms, and this guidance document remains relevant, and we recommend that it be used to inform the breeding bird survey methods used. The standard breeding bird methodology that NatureScot recommends to inform development proposals is the Moorland Breeding Bird Survey (adapted Brown & Shepherd method) with four survey visits at least seven days apart. This is the methodology we would recommend and should be scheduled to cover the whole breeding season between mid-April and early July. However, we note that the standard Brown & Shepherd method and an adapted version of the BTO breeding bird survey method have been used with three dawn visits in 2022 and a fourth visit in 2023 to cover Common Scoter. The BTO method is used to determine long-term population trends, rather than the territory mapping required. The more surveys undertaken, the more accurate the locational data, so it is best practice to undertake more than three visits. We understand that as BTO relies on volunteers with limited time availability to undertake surveys, the BTO Method is designed to minimise the number of survey visits for practical reasons. Starting breeding bird surveys in May, as in 2023, risks missing earlier breeding attempts, so this should be considered a limitation. Further information should be provided as to why NatureScot's standard survey methods for moorland breeding bird surveys have not been used in the EIAR, especially where less than four visits have taken place. We strongly recommend that surveys of the preferred Southern Access Route (SAR) to be undertaken in 2024, should follow NatureScot's standard methods.	As above, all field surveys followed standard survey and monitoring guidance recommended by NatureScot and CIEEM for upland bird survey. The SAR (and associated areas) was surveyed at the earliest opportunity (during the 2024 breeding season) as soon as the potential route had been finalised and agreed with landowners. Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR provides full methods for all field surveys undertaken.
RSPB-08	Survey Methodology - Common Scoter	Although we welcome that specific Common Scoter monitoring was actioned in the second year of surveys and continued monitoring is recommended in the Scoping Report (section 10.2.2), intensive surveys are required to confirm or discount breeding attempts and productivity. It is RSPB Scotland's view that a minimum of three surveys between 23rd April and 3rd June would be needed to confirm presence and numbers. RSPB undertakes two survey visits in May each year and would be happy to share this data to reduce disturbance impacts on the species. We also recommend that vantage point surveys are undertaken to locate nest sites. Vantage point (VP) watches during June are best for gathering data on movement and nesting areas to avoid	All field surveys followed standard survey and monitoring guidance recommended by NatureScot and CIEEM for upland bird survey, including sufficient buffers. Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR Report provides full methods for all field surveys undertaken.

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		influencing or disturbing the birds. However, during June it can be a very difficult to observe female birds as they only appear on the water for an hour or so when on 'recess' (leaving the nest to feed) and the timing of recess can vary widely from day to day and between females. Locating Common Scoter nests is specialist work which few ornithologists in the UK have successfully undertaken. It is, however, part of our annual programme of work at the West Inverness-shire Lochs SPA and we would be happy to discuss this further with a view to potentially including Loch Fearn. Ducklings can appear on the water any time from early July onwards, but this is dependent on nest survival and ducklings reaching the water successfully from their nest sites. Therefore, a lack of duckling observations does not necessarily equate with no breeding having taken place.	Monitoring of the scoter has been ongoing since 2022, and there are plans to continue this monitoring on an annual basis. Results of species-specific surveys undertaken so far can be found in Appendix 10.2 - Ornithology – Field Survey Methodology. To inform the planning process, the RSPB has provided its monitoring data up to 2024.
RSPB-09	Survey Methodology - Raptors	We strongly recommend that eagle data within 6km and other raptor data within 2km of the Pumped Storage Hydro (PSH) and SAR is requested from the Highland Raptor Study Group. Specific raptor surveys should also be undertaken to identify breeding territories.	The HRSG provided raptor data for both a 58km ² area around Loch Fearn and a 550 km ² area surrounding the entire Proposed Development.
RSPB-10	Survey Methodology - Loch Quoich and divers	To date, we understand that Loch Quoich has been scanned from the road as part of the breeding bird survey (section 10.4.1). We recommend that species-specific diver surveys to locate nest sites are undertaken in order to inform construction mitigation and due to the additional frequent and significant operational changes to water level anticipated.	Due to the already significantly fluctuating water levels of Loch Quoich, it is unsuitable for breeding divers, although both Black-throated- and Red-throated Divers are assessed within the EIAR Chapter 10 - Ornithology .
RSPB-11	Survey Methodology - Habitats, fish and invertebrates	To date, habitat surveys have only been undertaken in the area of the PSH. We understand that these will also be undertaken along the SAR or alternative access route in order to inform the EIA. We note that the ancient woodland remnants present along the SAR include significant numbers of mature, ancient and veteran trees, which are likely to be of particularly high biodiversity value and also that the SAR passes through the Glengarry Caledonian Pinewood Inventory site. We therefore strongly recommend any ancient native trees and 'granny' pines be mapped so they can be avoided and appropriately buffered when the track is upgraded. There is a need for additional surveys to take account of the impact on freshwater ecosystems e.g., aquatic invertebrates, the species dependent on them, fish and spawning areas etc. Glen Garry and the surrounding areas are nationally important for a suite of rare and endangered dragonflies. We therefore welcome the dragonfly surveys proposed and should cover all the M1 bog pools across the site as they may contain rare and endangered dragonfly species. Lastly, we note that gill netting surveys are proposed at Loch Fearn. This must be undertaken outside the Common Scoter breeding season or preferably, an alternative method such as environmental DNA, along with hydroacoustic assessments should be used to limit disturbance impacts and remove the risk of trapping.	The SAR (and associated areas) was surveyed in 2024 and the results and assessments are included in the EIAR in Chapter 8 – Terrestrial Ecology and Chapter 11 – Aquatic Ecology. No gill netting has been carried out.
RSPB-12	Survey Methodology - General comments	We recommend that information is provided within the EIA report to demonstrate that the survey data are adequate, robust and accurate, including: · Full information on any Common Scoter VP work undertaken at Loch Fearn, including dates, times, and weather conditions for each; as well as nest location data. · Maps showing data requested from the Highland Raptor Study Group, including Golden and White-tailed Eagle territories within 6km of the PSH and SAR. · Maps showing diver, wader, and raptor breeding, foraging and roosting areas, and Black Grouse lek sites within the NatureScot standard buffers from the PSH and SAR.	Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR provides full methods for all field surveys undertaken. Relevant figures can be found in Appendix 10.2 - Ornithology – Field Survey Methodology of the EIAR. Confidential Figure 10.1.2 concerns protected bird species and sensitive information and can be found in Confidential Appendix 10.1 – Ornithology.

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RSPB-13	Assessment of impacts on birds	The EIA should consider all the components of the proposal including dams, the inundation and creation of the new upper reservoir, underground waterway system, powerhouse, car parks, borrow pits, access roads, on site tracks, drainage, substation and temporary construction and accommodation buildings/storage compounds, as well as any existing road widening or upgrades. Disturbance, displacement, loss (direct and indirect) and fragmentation of suitable habitat (breeding, wintering and foraging) during construction and operation should be assessed for all scoped-in species. Impacts of all phases of the project including site selection, design, construction, operation and maintenance should be included in the assessment.	All components of the Proposed Development are considered within this Chapter in line with EIA Regulations.
RSPB-14	Additional Recommendations - Habitat changes and availability due to water level fluctuations	· Habitat changes and availability, and risk of nest site flooding from operational water level fluctuations on both Lochs Fearn and Quoich should also be included in the assessment. The proposed development is expected to draw up/down 10% of the water in Loch Quoich, resulting in a 2-3m water level reduction/increase. Although it is noted that the operational range of Loch Quoich is expected to remain unchanged from its current maximum and minimum levels, the water level changes are understood to potentially change over short periods of time (18-24 hours). At the Loch Fearn / Coire Dubh upper reservoir, when dammed and inundated, the water level would be raised by 62m and therefore the water level of Loch Fearn would fluctuate over a range of 60m. Although we understand full drawdown events are predicted to be more infrequent, and the day-to-day fluctuation of Loch Quoich by Fearn PSH is anticipated to be negligible, the potential impacts of this should be fully considered.	The potential ornithological impacts of the construction compound are considered in the EIAR Chapter 10 – Ornithology, Chapter 4 - Hydrology and Water Management, Chapter 11 - Aquatic Ecology and Chapter 8 - Terrestrial Ecology .
RSPB-15	Additional Recommendations -Cumulative impact of grid connection	· We understand from the Report that the Developer has accepted a Grid Connection Offer from National Grid but the preferred solution to connect the Proposed Development to the Transmission Network has not yet been confirmed (Section 3.4.1). The grid connections to receive and export power will be subject to separate applications. The likely cumulative impacts of this proposed element in addition to the PSH and SAR proposal should be considered in the EIA as it is such an important element that will be necessary for the operation of the scheme.	As the arrangement of the grid connection has yet to be defined, it is not possible to assess its cumulative effect at this stage. This can however be assessed as part of the planning application for the grid connection, at which stage the details will be known.
RSPB-16	Additional Recommendations - Construction compound impacts	· We note that the location of the temporary construction compound (with accommodation, storage and administration facilities) has not been finalised on any maps, although we understand that it will be in the vicinity of Lochan an Staic at the western end of the SAR and be operational for 5 years. This should be clarified when considering the scope of any EIA. The Scoping Report also states that it is anticipated that the construction period would last approximately five years and that the workforce would peak at between 400 to 500 people on-site in the middle of the construction period. A full assessment of ecological and ornithological impacts from this site needs to be included in the EIAR, including drainage and waste impacts on the oligotrophic waters of the West Inverness-shire Lochs SPA.	The location of the main construction compound has been finalised and is included and assessed in the EIAR in the various technical chapters. Effects on aquatic invertebrates in Loch Fearn are covered in the EIAR Chapter 11 – Aquatic Ecology . The knock-on effects on ornithological interests are assessed in Chapter 10 – Ornithology . Management of waste and drainage will be managed under licence from SEPA.
RSPB-17	Additional Recommendations - Potential effects on macroinvertebrates	· The Aquatic Ecology section of the Scoping Report suggests that the dewatering, water level fluctuations or pollution of Loch Fearn will affect the macroinvertebrate populations and predator/prey interactions with a negative effect on fish populations. However, this should also be considered for waterbird populations such as Common Scoter.	An assessment of the effects of temperature changes associated with the Proposed Development are discussed within EIAR Chapter 11: Aquatic Ecology .

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RSPB-18	Additional Recommendations - Potential effects of water temperature changes	· Assessment of the indirect impacts on the West Inverness-shire Lochs SPA Common Scoter population through changes in water temperature and resulting impacts on invertebrate food as far down the catchment as Loch Garry should also be included in the EIAR.	This is addressed in the EIAR, Chapter 11 – Aquatic Ecology .
RSPB-19	Additional Recommendations -Cumulative Impacts	A robust cumulative assessment of disturbance, displacement and habitat loss should take account of all operational, consented and proposed hydro and wind energy schemes that could impact on bird populations of both the relevant NHZ (NHZ 7 Northern Highlands) and the West Inverness-shire Lochs SPA. The in-combination effect of other relevant plans or projects, such as substations, overhead line grid connections and upgrades and forestry, should also be considered, including the Skye Reinforcement Project.	A cumulative assessment of potential impacts to birds is included within the EIAR Chapter 10 – Ornithology .
RSPB-20	Additional Recommendations - Habitat and Peatland Assessment	Policy 5 of NPF4 seeks to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. Policy 4 of NPF4 seeks to protect, restore and enhance natural assets, including protected sites, and states that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported. Results of the site-wide habitat and peat-depth survey show that much of the PSH area consists of Annex 1 habitats including blanket bog, bog pool, wet heath dry heath and montane heath habitats which will be permanently lost under the new dams and upper reservoir. Rapid and frequent water level change within the pump storage system will cause significant erosion of the peat substrate with associated carbon release. Peat depths up to 3.2m were recorded, and we welcome further peat probing to inform the assessment, including carbon release from peat losses and erosion. The final infrastructure design, including tracks should avoid deep peat where possible (over 50cm deep) and any sensitive Annex 1 habitats, including a suitable buffer to include any adjacent drying effects. Where it is proposed that tracks should cross peatland areas, an appropriate track design and construction methodology should be planned. We strongly recommend the preparation of a peat management plan (PMP) that is informed by peat depth probing, and by a full site appraisal of potential re-use opportunities, including information regarding the plans for excavated peat storage.	Effects on peat are discussed in full in the EIAR at Appendix 12.1 - PLHRA and Appendix 12.2 - PMP and summarised in Section 12.6 and Section 12.8 of Chapter 12 – Geology, Soils and Water . Areas of deep peat have been avoided where technically feasible and existing tracks utilised where possible. Details of peat re-use and habitat restoration is provided in Appendix 12.2 - PMP and in Appendix 8.7- Outline Biodiversity Enhancement and Management Plan . A carbon calculator is included in Appendix 12.3 .
RSPB-21	Additional Recommendations - Habitat and Peatland Assessment	NatureScot guidance is available on development on peatland and outlines recommendations for compensation and enhancement in line with Policy 3 of NPF4. This should be taken into account in relation to any proposed mitigation and compensation proposals. In relation to peatland, the NatureScot guidance states 'that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) would be in the order of 1:10 (lost:restored)' plus 'an additional 10% of the baseline assessment of the extent of priority peatland habitat for biodiversity enhancement'. However, it should be noted that M17 montane bog habitat is globally rare and M1 bog pools indicate priority peatland, and NatureScot recommends developments completely avoid impacting these habitats.	Noted, and covered in Appendix 8.7 of the EIAR.
RSPB-22	Additional Recommendations - Post-	We agree that details of compensation for significant residual ecological effects, and details of proposed biodiversity enhancements should be provided in an Outline Habitat Management Plan (HMP) to be included as part of the EIA Report (section 9.4.13). This should include mitigation,	Noted, and covered in Appendix 8.7 of the EIAR.

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	construction monitoring and Habitat Management Plan (HMP)	compensation and enhancement proposals for ornithological effects. In addition to the production of a HMP, which must include an indication of size of any areas to be restored, appropriate Species Protection Plans (SPPs) and a Deer Management Plan (DMP) should be drafted. The HMP must include a comprehensive monitoring programme for any habitat improvements, breeding birds on the site and future use of the site by breeding Common Scoter, raptors, divers and waders.	
RSPB-23	Additional Recommendations - Biodiversity Enhancement	We believe that development should leave nature in a better state than before it took place and welcome NPF4's commitment to deliver positive effects for biodiversity through development. Policy 1 of NPF4 states that 'when considering all development proposals significant weight will be given to the global climate and nature crises' (emphasis added). Therefore, significant weight should be given to compliance with Policy 3 Biodiversity, which states that: 'Development proposals for national or major development or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention'. It goes on to list a number of criteria which applicants must demonstrate they have met, including 'significant biodiversity enhancements are provided, in addition to (emphasis added) any proposed mitigation'. Scottish Government planning guidance on biodiversity, which focuses on the implementation of Policy 3 for EIA and major development was published in November 2023⁴. Despite the fact that the document is labelled 'Draft Planning Guidance', it is the up-to-date expression of the Government's position on the implementation of Policy 3. The term 'draft' does not indicate a consultation document but is understood to reflect that it is "a 'living document'... that will be updated as practice beds in" (paragraph 5.1). The document should therefore be given significant material weight.	Noted, and covered in Appendix 8.7 of the EIAR.
RSPB-24	Additional Recommendations - Biodiversity Enhancement	The Applicant should give early consideration to how positive effects for biodiversity would be delivered. The mitigation hierarchy should be followed, and any mitigation, compensation and enhancement measures must be clearly and separately identified within the EIA and other accompanying documents. It is RSPB Scotland's current view that biodiversity enhancement measures should not be delivered on designated sites for nature, apart from in a small number of exceptional circumstances, and enhancement measures must be truly additional. As much detail as possible should be provided in a HMP prior to consent in order that the benefits be fully considered alongside the application. Careful consideration should also be given to how any enhancement will be delivered and monitored in the long term and if any agreement and collaboration with other landowners and managers is needed. For a development of this size, we would recommend that biodiversity enhancement is considered at a landscape scale. This should consider existing habitat networks in the area and any ongoing species focused projects such as those for Common Scoter, North Atlantic Salmon, White-faced Darter, Azure Hawker and Northern Emerald dragonflies; and could include the following: - Peatland restoration in line with NatureScot guidance. - Riparian and native woodland expansion, including Caledonian pinewood regeneration (avoiding deep peat and sensitive areas supporting birds of open habitats). - Habitat restoration through measures such as deer control and Rhododendron ponticum removal.	An OBEMP is provided in the EIAR Appendix 8.7. This document and the compensation strategy summarised in Chapter 8, Section 8.12: Biodiversity Enhancements detail biodiversity enhancement objectives relating to priority peatland habitat. A full BEMP and will be produced, per recommendations in Chapter 8, Section 8.10: Mitigation and Compensation.

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		- Invasive non-native Mink control to reduce their impacts on ground-nesting birds and other wildlife. - Habitat restoration at Lochan an Staic.	
RSPB-25	Additional Recommendations - Biodiversity Enhancement	The Applicant has specifically sought feedback on the approach to measuring biodiversity enhancement. It is our general view that this could be done by understanding the existing baseline for habitats and species (including birds and aquatic invertebrates) and then monitoring future habitat condition and species presence and abundance and comparing to understand the level of enhancement. Although a form of metric could be used, this is not necessary as there is no metric currently in place for Scotland and this type of development and any existing metric is likely to have significant limitations and good outcomes can be achieved using other methods.	Noted. This is addressed in the EIAR Appendix 8.7 – OBEMP .
RSPB-26	Additional Recommendations - Compensatory planting	Lastly, the Applicant expects that the potential construction compound and preferred SAR would require the removal of approximately 25ha of non-native conifer forestry. Depending on the location, compensatory planting may not be required as per Annex C of Scottish Forestry guidance ^{5,6} regarding removal of woodland from deep peat, but agree that detailed plans should be provided within the final submission if it is deemed that it is required. We would strongly suggest any planting be native origin and choice of location informed by a suite of habitat, peat and bird surveys.	Noted. This is addressed in the EIAR Appendix 8.7 – OBEMP .
SRWAS-01	Scotways records	The enclosed map shows that rights of way HL11, HL12, HL21 and HL22 as recorded in the National Catalogue of Rights of Way (CROW) cross or are close to the application site as shown on Figure 3.1 Site Location Plan. The enclosed map shows the Heritage Paths project promotes a route, Gleann Cia-aig Drove Road [HP167], for its historic interest. This old route crosses or is close to the application site as shown on Figure 3.1 Site Location Plan. The enclosed map shows that our book Scottish Hill Tracks describes route numbers 238 The Dark Mile (Loch Arkraig) to Invergarry or Loch Garry, 239 Loch Garry to Laggan Locks and 247 Strathan (Loch Arkraig) to Tomdoun (Glen Garry) which cross or are close to the application site as shown on Figure 3.1 Site Location Plan. In searching our records at this scoping stage, we have focussed solely on the immediate area of the proposed application and the proposed Southern Access Route (SAR). If required by the applicant to inform their Environmental Impact Assessment (EIA), maps of a wider search area are available from ScotWays, alongside a more detailed response.	The maps and information provided by Scotways have been included in the figures and assessment in the EIAR Chapter 14 – Recreation and Access .
SRWAS-02	Other Access to Land	You should be aware that other forms of public access to land may affect the planning application site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes.	Noted, and guidance notes used to inform the assessment in the EIAR Chapter 14 – Recreation and Access .
SRWAS-03	Recreational amenity	As well as direct impacts of development upon public access, ScotWays has an interest in impacts on recreational amenity, so this includes the impact of developments on the wider landscape. We anticipate that the applicant will take into account both recreational amenity and landscape impacts in developing their proposals for this site. We will consider these issues further should this scoping stage lead to a planning application.	These have been addressed in the assessments carried out in the EIA and reported in Chapter 7 – Landscape and Visual and its associated appendices and figures.
SW-01	No objection	Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following:	Noted. The Applicant has no intention of taking any services from Scottish Water.
SW-02	Drinking Water Protected Areas	A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness	Noted.

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		supplies Invermoriston Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. In the event of an incident occurring that could affect Scottish Water we should be notified immediately using the Customer Helpline number 0800 0778 778. Abstraction for nearby WTW's (Inchlaggan and Invergarry) will not be impacted by the proposed development. From a water quantity perspective this activity is likely to be of low risk, however from a water quality point of view we need to ensure mitigations are implemented to reduce any risks that could affect our public drinking water supplies, especially given that there is a lot of other potential developments in this catchment and a proposed timeline if this development goes ahead would be useful to know in advance. Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Please note that site specific risks and mitigation measures will require to be assessed and implemented. These documents and other supporting information can be found on the activities within our catchments page of our website at www.scottishwater.co.uk/slm	Assessments of potential impacts on the water environment, including Scottish Water assets and Drinking Water Protected Areas, is assessed in the EIAR, Chapter 12 – Geology, Soils and Water. Confirmatory water quality monitoring is proposed prior to, during and following construction (should planning permission be granted).
SW-03	Further Communication	We welcome receipt of this notification about the proposed activity within a drinking water catchment where a Scottish Water abstraction is located. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also anyone working on site should be made aware of this during site inductions. We would request further involvement at the more detailed design stages, to determine the most appropriate proposals and mitigation within the catchment to protect water quality and quantity. We would also like to take the opportunity, to request that 3 months in advance of any works commencing on site, Scottish Water is notified at protectdwsources@scottishwater.co.uk. This will enable us to be aware of activities in the catchment and to determine if a site meeting would be appropriate and beneficial.	Noted.
SW-04	Surface Water	For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.	Noted. There are no proposals to connect to Scottish Water storm water or foul water infrastructure.
SC-01	Use of canal for freight	SC recognises the significant opportunity for pump hydro scheme(s) to use the Caledonian Canal for a variety of freight purposes.	Noted.
SC-02	Proposed use for freight	SC notes that the development will involve transporting wide loads and we welcome the proposal in the EIA scoping report for barge access from Inverness to Loch Ness is to be included in the Route Survey Report.	Noted.
SC-03	Trial passages for Coire Glas	SC supported trial passages of water-based freight in relation to the Coire Glas pumped storage hydro-scheme development on Loch Lochy in late 2022.	Noted.
SC-04	Reduction of AILs on roads	Use of the canal to support hydro-related transport can significantly reduce the number of abnormal indivisible loads on the already congested A82 and wider Highland road network.	Noted.

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SC-05	Reduced carbon emissions	We note that the use of water borne freight has the potential to reduce the transport carbon emissions during the construction phase of the Proposed Development.	Noted.
SC-06	Welcomes discussions	SC would welcome the opportunity to discuss the potential use of the Caledonian Canal for freight purposes with the Developer as part of the EIA process.	The applicant has engaged with Scottish Canals, HIE and other stakeholders and developers via the PSH round table event and subsequent discussion. Whilst the Caledonian Canal could provide a proportion of the transportation route between the ports of Corpach and/or Inverness to the site, a further 30km of onward transportation by road haulage would still be required.
GGCC-01	Previous Planning Refusal	A previous planning application (16/04506/FUL) to build a much smaller hydro power scheme around and below Loch Fearn was refused by The Highland Council, due to: · The significant adverse and long term impact on the Wild Land Area, it's qualities of naturalness and remoteness, and the prevailing sense of solitude. · It did not respect the landscape characteristics and special qualities of the Special Landscape Area (SLA) and that · It failed to demonstrate that the development would not have an adverse impact on trees, woodlands and protected mammals as a result of buried power cable.	This is a different application for a different type of scheme which will have a capacity 3,000 times that of the refused scheme as well as providing a nationally significant volume of electricity storage.
GGCC-02	Landslide and Flooding Risk	A landslide in 2018 in the immediate vicinity of the proposed works requires that GCC asks, on behalf of the people of Glengarry, for complete reassurance about the future stability of both the proposed dam and the existing dam. An analysis, before permission is granted, should include the risk associated with blasting, quarrying and tunnelling nearby. And it should include the risk associated with dam failure and subsequent flooding. In addition a risk analysis of the impact of climate change, particularly as it relates to flash flooding, should be done.	Landslide risk and potential impacts associated with the landslide are discussed in the EIAR at Appendix 12.1 - PLHRA and Section 12.6 of Chapter 12 – Geology, Soils and Water . A flood risk screening is presented in Section 12.6 of Chapter 12, as is potential changes to rainfall patterns as a result of climate change. The detailed design of all elements of the Proposed Development will be informed by site investigation and will comply with all relevant regulatory legislation. The design of the dams and their inspection and maintenance will be controlled and regulated by the Reservoirs Act. The Act will ensure that the dams do not increase flood risk.
GGCC-03	Access and Roads	The C1144 road is very long, single track and narrow, through the 'last great wilderness of the UK' down to the coast (where they are off grid it is so remote). There is particular narrowing at the existing Quoich dam where it is enclosed by the dam on one side and rock formations on the other. Widening this stretch, given the blast risks already found, will be 'challenging'. The weight and volume of traffic analysis, including past Invergarry school and calculation of baseline, do not seem to consider the numbers of concurrent movements of traffic caused by other major infrastructure projects in Glengarry. The preferred access route, using forest tracks, is not a 'given', yet the submission is silent on what happens if the project does not get permissions to use. Even if permission is given, there is a	Details of the access and construction compound in which the application is based are included in the EIAR in Chapter 2 – The Proposed Development .

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		substantial stretch, possibly to include a new builders encampment, on virgin ground opposite Kingie. Although the scoping document does not seem to identify the size and position of this encampment.	
GGCC-04	Landscape and Visual	GCC agrees with the previous refusal from The Highland Council (THC) that the adverse impact on the landscape, in every sense including visual, is extensive. GCC would wish that all temporary infrastructure, such as the encampment and new roads and bridges, having a detrimental visual and landscape impact, are returned to nature. GCC wishes the Energy Consents Unit (ECU) to also consider the impact of the inevitable ancillary works, such as switching stations and overhead lines.	The camp will be reinstated after construction is complete, but the road would be retained for use during future maintenance and refurbishment requiring the transit of abnormal loads. The grid connection for the Proposed Development will be subject to a separate planning application by the electricity transmission undertaker, SSEN.
GGCC-05	Terrestrial Ecology, Ornithology and Aquatic Ecology	Local people who live and work in and around the proposed site will have a wealth of knowledge regarding all wildlife and of the landscape features, and should be included in any surveys. GCC welcomes any improvement to the natural order. We note that there does not appear to be consideration of the impact upon the fish (especially Salmon) of the new road and bridge works where they cross the rivers Kingie and Garry. It should be noted that it is the Ness District Salmon Fisheries Broad (NDSFB) that is responsible for the River Garry system and they should be added as a consultee.	These points have been considered in the EIAR, regarding fish issues in Chapter 11 – Aquatic Ecology . The NDSFB have been consulted regarding the application.
GGCC-06	Socio-economic and Tourism	GCC welcomes the possibility of increased employment locally, particularly for young people. We note the report references the possibility of training and apprenticeships that we would support. We note a discrepancy between paragraphs 14.3.4 and 17.3.13. The first suggesting that there will be no problem with traffic in the operational phase. The other suggesting a large volume of traffic supporting business. This contradiction should be addressed. Local businesses (especially tourism businesses), who appear to be missed from the relevant listings in some cases, should be asked about the impact upon their business.	The EIAR includes at Chapter 17 – Socioeconomics and Tourism a socioeconomic and tourism impact assessment across development, construction and operation phases. This Chapter should be read in conjunction with the EIAR Chapter 15 - Transport and Access . Primary research has not been completed. The assessment has drawn on secondary research in relation to public attitudes to green energy and renewable energy.
GGCC-07	Decommissioning	It is not clear from the report exactly how much decommissioning is proposed. At one point it states there will be none. GCC would wish for all temporary infrastructure to be removed and the landscape put back to where it was.	The EIAR includes a section on decommissioning in Chapter 2 – The Proposed Development (at para 2.17).
GGCC-08	Sections 1 – 5. General - Clarification of Access Details	3.5.2: An extensive length of new/upgraded track through forest is proposed, with limited mention of restoration at the end of the project. Also, the project still proposes using a very restricted part of C1144 that goes past the existing Loch Quoich dam.	This is correct. Full details are given in Chapter 2 – The Proposed Development and associated figures.
GGCC-09	Sections 1 – 5. General - Clarification of Energy Targets	4.3.1: What percentage of the 'target of 100% of electricity to be generated by renewables by 2020' will this project provide? (And good luck with achieving it by 2020!) Also, what percentage of the required mass energy storage of electricity required by the UK will be provided by this pump storage system?	In the EIAR Chapter 3 – Consideration of Alternatives and Design Evolution, Paragraph 3.3 and Plate 3.1 – PSH Schemes Compared show the relative capacity and storage capacity of all PSH schemes currently in the UK planning system. This gives an idea of the context of the Proposed Development in relation to the need, which could utilise all of the schemes shown.

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GGCC-10	Section 6. Hydrology and water management	6.3.5: The likely more rapid change in the water level of Loch Quoich will impede the use of boats from the existing slipway/s, that are already awkward to use.	The EIAR at Chapter 2 – The Proposed Development includes details of the proposed upgraded boat access facilities which address this point.
GGCC-11	Section 7. Landscape and Visual - Previously Refused RoR Hydro Scheme	7.1.2: In 2016/17 an application (16/04506/FUL) for a hydro power scheme around and below Loch Fearn was refused by The Highland Council (THC) due to, amongst other things: · The significant adverse and long term impact on the Wild Land Area, in particular it's qualities of naturalness and remoteness... · The dam would diminish the prevailing sense of solitude and remoteness in this special landscape area (SLA). · Proposals would not reflect or respect the landscape characteristics and special qualities of the SLA. It was also dismissed on review (17/00060/RBREF). The Fearn project is significantly bigger than the previous proposal and will consequently have even larger impact. Further, although we understand it is not in the remit of this project, we have real concerns about the impact on the landscape (in every sense) due to the inevitable ancillary works for connection to the grid. We are already facing a Skye reinforcement project (mentioned elsewhere) and have experience of how this is dealt with for the Coire Glas PSH scheme, where the impact of the various switching stations and overhead lines all across the landscape appeared to be an afterthought. The combined pressure on the environment of Glengarry is significant.	See GGCC-01 for a response on the earlier run-of-river scheme. The Applicant is not in control of the grid connection design and planning application for reasons related to the regulation of the electricity market. The Applicant will however endeavour to push the progress of the grid connection so that clarity on this will be available as soon as possible.
GGCC-12	Section 7. Landscape and Visual - New Gearr Garry Bridge	7.2.3: We note the new road and bridge needed to get to and cross the Gearr Garry is not mentioned here, although it comes later. This is significant landscape and visual impact.	The bridge over the Gearr Garry is detailed in Chapter 2 – The Proposed Development and associated figures. Within the EIAR at Chapter 7 – Landscape and Visual , potential impacts of the Southern Access Route (SAR), including both the new section of track and works to upgrade existing sections are assessed as part of the LVIA.
GGCC-13	Section 7. Landscape and Visual - Access to Wilderness	7.2.6: In addition to the formal land designations, the whole area is often colloquially described, truthfully, as being the 'last great wilderness of the UK'. The project is on the only access route into that wilderness.	Within the EIAR at Chapter 7 – Landscape and Visual , the LVIA considers the effects on the Minor Road (see Appendix 7.2) and wild land qualities (see Appendix 7.4). Specific consideration of the experience of moving through and towards more remote landscapes is covered in SLA assessment of the SQ "the 'back door' of Knoydart" (see Appendix 7.5).
GGCC-14	Section 8. Land Use and Recreation	8.2.5: We wish to note that tourism and recreation generally are the major economic activity of the area, due to the remote, wild nature. Many walkers go via the glen and the impact upon these people should not be under-estimated.	
GGCC-15	Section 9. Terrestrial Ecology	9.2.4: In 2016/17 an application (16/04506/FUL) for a hydro power scheme around and below Loch Fearn was refused by The Highland Council (THC), partly due to 'the applicant failed to demonstrate that the development would not have an adverse impact on trees, woodlands and protected mammals as a result of buried power cable'. 9.4.2: There is much local knowledge available within the heads of people who live and work on the ground. Asking them is something that should be considered as part of any survey.	The Developer has consulted with local people through attendance at community council meetings and at public consultation events.

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		9.4.14: Amphibians and reptiles should not be 'scoped out'. It may be correct that the site is unlikely to support these species but how would we know without a survey?	The scope of the terrestrial and other ecology surveys has been agreed with THC, NatureScot and the NDSFB.
GGCC-16	Section 10. Ornithology	10.2.7: We note the large number of nationally rare bird species, due to the remote, wild nature of the area. But we cannot find a full list of birds found in the survey. There is local knowledge of a range of birds that do not appear to be mentioned, including Golden Eagle, Sea Eagle and Osprey. And there will be others.	The full list of birds surveyed is in Chapter 10 – Ornithology and its appendices. The details of some birds are kept confidential except from authorised consultees.
GGCC-17	Section 11. Aquatic Ecology	11.2.2: We welcome the chance to be asked for aquatic data. There is much local knowledge regarding the fish and fishing on and around the river Garry. We are aware that the Ness District Salmon Fishery Board (NDSFB) is desperately trying to revive the virtually non-existent Salmon stocks within the rivers Garry and Kingie, by 'seeding' the Kingie. We therefore request that an aquatic assessment is made of the impact of the tracks, roads and bridges over the Kingie and Gearr Garry. Further, as we understand it, the NDSFB is responsible for the river Garry system (not the Lochaber District Salmon Fisheries Board). NDSFB should be added to the list of consultees. 11.2.6: We are disappointed to note that the fact existing dams have ruined the fish ecology is being used to justify another dam. One quote from the Inverness Courier (1/4/2024): "Loch Quoich is already a degraded environment, a consequence of the construction of a large dam at its outlet in the 1950s. Salmon have been denied access ever since the loch was dammed and the shoreline is regularly subject to large variations in the water level". The Salmon heck at Kingie is now disused because there are no Salmon. The unintended consequences of dams are not necessarily known until well after they are built.	The Developer has consulted formally with the NDSFB as well as informally with local fisherman and ghillies, and the knowledge from this consultation has helped to inform the EIA. Potential effects on fish species within the Kingie and Gearr Garry relating to the Southern Access Route (SAR) are assessed in EIAR Chapter 11: Aquatic Ecology . Where these impact on ornithological interests, they are assessed in Chapter 10 – Ornithology .
GGCC-18	Section 12. Geology, Soils and Water - Landslide risk	12.4.1 (see also Section 19): No reference is made to the landslide that occurred in 2018 in the vicinity of the existing and proposed dams. This landslide took out the pylons and power line that runs to Skye. Within the linked document1 it states: Rock movement on the failed bluff above the NeSTS trial OHL site during construction and the risk of imminent further mass landslide was a constant backdrop to the project, and influenced the amount of risk taken in its foundation design. And: Foundation design was constrained by the proximity to the failed rock bluff responsible for the landslide, which has a large, partially detached body of rock which poses an imminent risk of further significant landslide. And: Techniques employing pyrotechnic rock breaking and / or large diameter augering plant were discounted due to vibration risk. It may be that there is no continuing risk arising from the construction of a dam nearby and over the existing dam, but the communities of Glengarry would wish to be completely reassured that the structural integrity of the proposed and existing dams will be maintained in the event of further landslides. Indeed, in any event.	Geological and geotechnical investigations of the stability of the area have been carried out by specialist consultants. Further intrusive investigation is planned and the detailed design of the Proposed Development will recognise the results and analysis
GGCC-19	Section 12. Geology, Soils and Water - Flood risk in	12.4.6 (see also Section 19): Given the above, it cannot be acceptable that flood risk is 'scoped out'.	Flood risk is covered in the EIAR in Chapter 12 – Geology, Soils and Water..

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	relation to landslide risk		
GGCC-20	Section 13. Cultural Heritage	Most of the cultural heritage in the vicinity has already been destroyed by the Quoich dam.	Noted.
GGCC-21	Section 14. Transport and Access - reinstatement of tracks post construction	14.1.3: The phrase 'temporary effects' is used throughout. Two comments arise. First, how long is temporary? We understand this is a long term project of over ten years, a lifetime for some. Second, we take encouragement that it is temporary – so forest tracks will be put back (eventually) to what they are – forest tracks. And any new bridges, tracks and other infrastructure will be landscaped back to their original state – that is as if they were never there.	As detailed in Chapter 2 – The Proposed Development , the Southern Access Route (SAR) would be retained, not reinstated.
GGCC22	Section 14. Transport and Access - proposed use of busses	14.2.1: The use of buses is suggested but there is a sign at the end of the C1144 road saying the road is unsuitable for buses. We really don't think the limitations on the capacity of the road are fully understood. It's a very long, narrow, single-track road into the wilderness. Representation has recently been made to us that the end of the road (where, ironically, they are 'off grid' entirely) is so poor that even the postal service struggles to get there and supermarket deliveries have been cancelled due to the dangerous state of the road.	This traffic would be using the SAR, not the C1144.
GGCC-23	Section 14. Transport and Access - vibration during road rock excavation	14.2.2: We would be interested to see the risk assessment associated with removing the rock to widen the C1144 'around the Quoich dam' as the risk, of blasting and vibration (noted above) immediately below the previous landslide, could be significant.	Geology and ground stability is assessed in the EIAR at Chapter 12 – Geology, Soils and Water .
GGCC-24	Section 14. Transport and Access - restoration of Gearr Garry Bridge	14.2.5: The new bridge across the Gearr Garry is noted. But no mention of restoration after the project.	As detailed in the EIAR Chapter 2 – The Proposed Development , the Southern Access Route (SAR) would be retained, not reinstated.
GGCC-25	Section 14. Transport and Access - construction compound detail	14.2.6: How big is this staff/supplies compound and where is it?	Details of the main compound are included in the EIAR Chapter 2 – The Proposed Development .
GGCC-26	Section 14. Transport and Access - cumulative pressure	14.2.9: If the landowners do not agree to the SAR, then all traffic will be via the C1144. Even with the preferred SAR, cumulative access pressure for various major projects is substantial. For example, for the concurrent Skye Reinforcement Project, the Highland Council has estimated extra traffic as: C1144 Quoich Road and U1207 Loch Hour Road 29,514 LGVs/cars and 25,525 HGVs. We do not believe it is sustainable to continue adding in this cumulative way.	The basis of this application is the use of the SAR for construction. Landowner negotiations have progressed and are entering their final stages.
GGCC-27	Section 14. Transport and Access - Assess SAR	14.2.11: The study area should also include the damage caused (ecological etc) along the route of the preferred SAR. Also, some analysis of extra risk within the village of Invergarry should be undertaken. In particular, we have many representations regarding the issue of weight and speed of traffic past the school. Regardless of whether or not the preferred SAR is used, all the traffic will pass	Traffic through Invergarry village is assessed in the EIAR in Chapter 15 – Transport and Access in accordance with the methodology agreed with Transport Scotland. This considers

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		through the village. What is the projected volume of traffic? 14.2.16: The Route Survey Report (RSR) should include analysis in the case that the preferred SAR is not used.	cumulative impacts from other infrastructure projects.
GGCC-28	Section 14. Transport and Access - traffic figures	14.3.3: The percentage increase should be calculated when there is no other construction traffic (see 14.2.29 above for cumulative impact comment.)	As GGCC-27 above.
GGCC-29	Section 14. Transport and Access - decommissioning	14.3.6: Decommissioning should be included. This would give reassurance that the preferred SAR will be taken away, rather than just left in the landscape, like many other things in the glen. (For example, see the concrete blast bunkers above Kingie – left in the landscape after the dam build in the 1950s.)	As detailed in Chapter 2 – The Proposed Development , the Southern Access Route (SAR) would be retained, not reinstated.
GGCC-30	Section 14. Transport and Access - traffic analysis	14.4.2: These rules are not appropriate for this situation due to the fragility of the roads and environment. And emphasises the need to be clear about what percentage is being measured. See above for comments on cumulative impacts.	Traffic is assessed in the EIAR in Chapter 15 – Transport and Access in accordance with the methodology agreed with Transport Scotland. This considers cumulative impacts from other infrastructure projects.
GGCC-31	Section 14. Transport and Access - traffic analysis	14.4.6: It is not appropriate to include planning consented traffic to the base line for the reasons given above.	Traffic is assessed in the EIAR in Chapter 15 – Transport and Access in accordance with the methodology agreed with Transport Scotland. This considers cumulative impacts from other infrastructure projects.
GGCC-32	Section 14. Transport and Access - traffic analysis	14.4.7: This is not a 'general' case and a formal transport assessment is necessary for the reasons given above.	Traffic is assessed in the EIAR in Chapter 15 – Transport and Access in accordance with the methodology agreed with Transport Scotland. This considers cumulative impacts from other infrastructure projects.
GGCC-33	Section 15. Noise and Vibration - landslide risk	15.5.10: The remoteness of the location from residences is obvious; it is in a Wild Land Area. But, given the landslide risk already found in the vicinity of the dams, we would urge analysis of construction vibration (particularly from blasting) on all the surrounding bluffs and rock formations.	Geological and geotechnical investigations of the stability of the area have been carried out by specialist consultants. Further intrusive investigation is planned and the detailed design of the Proposed Development will recognise the results and analysis, including the potential effects of construction vibration, which is assessed in the EIAR in Chapter 16 – Noise and Vibration .
GGCC-34	Section 15. Noise and Vibration - noise in village	15.5.15: As with 14.2.11 above, analysis of traffic noise through the village should be considered.	An assessment has been undertaken in accordance with the DMRB (Design Manual Roads and Bridges) LA111, and CRTN (calculation of road traffic noise). The EIA has considered traffic on public roads, and although this has highlighted Noise Sensitive Receptor 4 (NSR4) as the nearest to the proposed junction works on the A87, impacts at the other receptors within the village

Ref	Subject	Consultee Comment	Response / Comments
			are considered and impacts would be consistent with those at NSR4 for passing traffic of the same magnitude along the route. This assessment is reflected in the EIAR at Chapter 16 – Noise and Vibration, in Section 16.9, and the findings would remain the same for other sensitive receptors along this route.
GGCC-35	Section 16. Air Quality	16.3.17: What decommissioning is not envisaged? GCC would expect all the various 'temporary' infrastructure to be decommissioned.	Decommissioning and reinstatement is covered in the EIAR in Chapter 2 – The Proposed Development .
GGCC-36	Section 16. Air Quality	16.3.18: We note that the cumulative impacts for air quality is requested to be scoped out. This suggests that the cumulative impact of other items, such as road traffic mentioned above, can be scoped in.	Noted.
GGCC-37	Section 17. Socioeconomic s and Tourism - road access for hillwalkers	17.3.3: We have recently been approached by a local business to express dissatisfaction that the C1144 road is often closed, such that walkers (using their business) are unable to walk the various paths and Munros in the glen.	Noted. The use of the Southern Access Route through the Glen Garry forest is designed to avoid this issue.
GGCC-38	Section 17. Socioeconomic s and Tourism - access for canoeists	17.3.4: There are often canoeists from local tourist businesses taking advantage of the 'white water' in and around Whitebridge. They would need to be reassured that the use of Whitebridge (on the preferred SAR) for access would not disrupt their business.	This is addressed in the EIAR in Chapter 14 – Recreation and Access and the associated Appendix 14.1 - Draft Outdoor Access Management Plan .
GGCC-39	Section 17. Socioeconomic s and Tourism - clarify operational traffic	17.3.13: 14.3.4 states that there will be negligible operational traffic effect and pleads that no traffic assessment is needed for the operational phase. Now, here, the report is stating there will be a large increase in traffic boosting the economy. Which is it?	Details of the operational traffic are in the EIAR at Chapter 15 – Transport and Access .
GGCC-40	Section 17. Socioeconomic s and Tourism - training opportunities	17.4.9: GCC welcomes the addition of highly skilled workers, especially if drawn from the local area. We are interested in the training opportunities being afforded, especially to young people, in the local area and would urge the developer to fully explore local training/apprenticeship input.	Noted. The Developer is equally interested in providing training opportunities.
GGCC-41	Section 18. Forestry	18.4.2: We welcome any mitigation for damage caused to trees and woodland and, in doing so, note that the 2016/17 application (16/04506/FUL) for a hydro power scheme around and below Loch Fearn was refused by The Highland Council (THC) due to the potential adverse impact on trees and woodland.	Noted.
GGCC-42	Section 19. Recommended Features to be Scoped out of EIA - timing of	19.2.1: We note that there is a separate law for 'the risks associated with failure of any proposed dams' and that it, according to the scoping report, comes into play 'after planning permission is granted, rather than part of any EIA'. This is the wrong way round. An assessment, including flood risk mapping, of what may happen in the event of the failure of one or both dams should be conducted prior to planning permission being granted. We feel it reasonable to request this as The	Irrespective of gaining consent under Section 36 of the Electricity Act, it will not be possible to build the scheme without it complying with the provisions of the Reservoirs Act (Scotland) Act 2011.

Ref	Subject	Consultee Comment	Response / Comments
	Reservoirs Act requirements	Reservoirs (Scotland) Act 2011 states (our underline emphasis): <i>An Act of the Scottish Parliament to make provision about the regulation of the construction, alteration and management of certain reservoirs, in particular in relation to the risk of flooding from such reservoirs, ..., about offences to facilitate the achievement of the environmental objectives set out in river basin management plans; and for connected purposes.</i>	
GGCC-43	Section 19. Recommended Features to be Scoped out of EIA - dam risk	19.2.2: We note here that the risk of 'other major accidents and/or disasters is considered to be very low'. This statement suggests that the risk at 19.2.1 is NOT considered to be very low. Glengarry residents need to be completely reassured on this point.	As GGCC-42 above.
GGCC-44	Section 19. Recommended Features to be Scoped out of EIA - impacts of climate change	19.3.4: The whole reason for the project relates to climate change. We are told that there will be more and larger storms and flooding. So, it seems strange that this project does not consider it worthwhile examining the possible impacts of that climate change. Especially as it relates to flooding and flash flooding, in pluvial and fluvial circumstances.	The effects of climate change in relation to flooding will be addressed in the design of the dam under the Reservoirs (Scotland) Act 2011.
BUG-01	Proposed scope of macroinvertebrate surveys	The Scoping Report has determined that the Fearn Pumped Storage Hydro Project could result in potentially significant effects to aquatic ecology in Loch Fearn and Loch Quoich. Some of the possible impacts to macroinvertebrates include the effects of drawdown (with the resulting loss of habitat suitability), direct mortality and increased risk of invasive species. Impacts of drawdown are of particular concern. Different invertebrate species have varying degrees of tolerance to water fluctuations making it vital that adequate surveys are undertaken to understand the invertebrate communities that are present to be able to determine the magnitude of impacts. The Scoping Report states that "The water level of Loch Fearn would fluctuate over a range of 60m". This is an incredibly high range and Buglife asks for clarification if this is correct? Some macroinvertebrate surveys have already been undertaken but the Scoping Report does not provide details of methodology or where samples were undertaken. Buglife would like to query the figures that state "The diversity of taxa was stable and relatively high ranging from 669 to 200 in the proposed upper reservoir (Loch Fearn and tributaries)". 669 taxa is an incredibly high figure so clarification is needed on if this is what was recorded or a possible abundance number.	Effects on Macroinvertebrates are discussed in EIAR Chapter 11: Aquatic Ecology. Macroinvertebrate survey methodologies, survey locations and indices are provided in the Appendices: 11.1 - Fearn Aquatic Ecology Surveys and 11.2 - Southern Access Route (SAR) Aquatic Ecology Surveys. A comprehensive suite of biotic indices for each survey location provides: • BMWP - Biological Monitoring Working Party Score • NTAXA (TL1 and TL2) - Count of BMWP family taxa in the sample • ASPT (TL1 and TL2) - Average score per (BMWP/WHPT) taxon • LIFE (TL5 and TL2) - Lotic-Invertebrate index for Flow Evaluation • PSI (TL5 and TL3) - Proportion of Sediment-sensitive Invertebrates • E-PSI (FAM and TL5) - Empirically Weighted Proportion of Sediment-sensitive Invertebrates Index • CCI (TL5) - Community Conservation Index (TL5 only) • WHPT (TL2) - Whalley-Hawkes-Paisley-Trigg index Buglife is correct to query the 'diversity of taxa' numbers reported in the Scoping report as these

Ref	Subject	Consultee Comment	Response / Comments
			are the combined total abundances at each survey location rather than n-taxa values. Full results and discussion are provided in Appendices: 11.1 - Fearna Aquatic Ecology Surveys and 11.2 - Southern Access Route (SAR) Aquatic Ecology Surveys.
BUG-02	Proposed scope of macroinvertebrate surveys	Buglife welcomes that further surveys are proposed for macroinvertebrates. These surveys must be comprehensive to ensure a full understanding of impacts. The number of sampling locations should ensure that adequate coverage is achieved of the shorelines of both lochs where drawdown impacts are predicted. Surveys must also ensure they capture seasonal variation to cover the most detectable life stages of species groups such as caddisflies and mayflies. Some useful references to design appropriate surveys are 'Handbook of Conservation Methods'¹, 'Freshwater Biology and Ecology Handbook'² and 'Organising surveys to determine site quality for invertebrates'.³ The Community Conservation Index (CCI)⁴ should then be used to determine the conservation value of the affected areas. Buglife recommend that it is key to identify taxa that are intolerant of excessive water fluctuations, as this will be one of the main effects of the scheme.	Further surveys of terrestrial invertebrates were carried out in 2024 and are reported and assessed in the EIAR Chapter 8 – Terrestrial Ecology. Effects on Macroinvertebrates are discussed in EIAR Chapter 11: Aquatic Ecology. Macroinvertebrates samples in lotic environments were collected using the standard SEPA and Environment Agency kick sampling method. The macroinvertebrate sample was collected using a standard Freshwater Biological Association Pond net (mesh diameter 1.0 x 1.0mm). In lentic water systems such as Loch Quoich and Loch Fearna, sweep sampling was the preferred method of sampling. This relied on a disturbance of the substrate and then a sweeping like motion in a figure of eight of the pond net through the water column to collect the sample (Chadd, 2010). Sampling was conducted in Spring 2023 (Fearna PSH) and Autumn 2023 (SAR). A comprehensive suite of biotic indices for each survey location includes the Community Conservation Index (CCI).
BUG-03	Proposed scope of terrestrial invertebrate surveys	Buglife is concerned that the proposed scope for terrestrial invertebrates is limited to dragonfly surveys. Dragonfly surveys are clearly appropriate given the habitats present and the records returned from the desk study. However, given the range of habitats impacted, Buglife strongly recommends that a range of invertebrate surveys are undertaken, as determined by a suitably qualified entomologist. A comprehensive approach would include survey for the entire development area to allow impacts on species of conservation concern to be determined, including those listed on the Scottish Biodiversity List (SBL)⁵. SBL species are of principal importance for conservation and a material consideration in a planning application. Direct habitat loss and indirect impacts such as fragmentation and changes to vegetation, all have the potential to adversely affect the invertebrate assemblage.	In addition to the dragonfly surveys, a general Invertebrate Survey was carried out in the summer of 2024. The results are presented in Appendix 8.5, and species scoped into this report are further detailed in the EIAR Chapter 8 – Terrestrial Ecology at Section 8.6: Baseline Condition.

Ref	Subject	Consultee Comment	Response / Comments
BUG-04		If it is possible, we would really value viewing the full taxa lists for the aquatic invertebrate surveys that are mentioned as Appendix K & L. Also, do you have information on the locations of the surveys?	Full taxa lists are provided in the EIAR Chapter 11 – Aquatic Ecology at Appendices: 11.1 - Fearna Aquatic Ecology Surveys and 11.2 - Southern Access Route (SAR) Aquatic Ecology Surveys.
BUG-05		As we highlighted in our scoping comments, it is very important that for a full assessment of impacts that the surveys are comprehensive, with the Lochs that have extensive shoreline habitats requiring several sampling locations. Buglife understands it is likely to be the aquatic invertebrate communities in the Lochs that would be most impacted by proposals from the impacts of drawdown. I am unsure if further surveys are planned this year to ensure seasonal variation is also captured? I would also reiterate from our comments that it is important the methodology for surveys and assessment used for the Lochs is appropriate for standing water habitat.	A 3-minute kick / sweep sampling methodology followed by a manual hand search is employed for standing waters. This relied on a disturbance of the substrate and then a sweeping like motion in a figure of eight of the pond net through the water column to collect the sample (Chadd, 2010). All macroinvertebrate samples were collected using a standard Freshwater Biological Association pond net (mesh diameter 1.0 x 1.0 mm).
BUG-06		We really welcome the engagement with a local dragonfly expert and the efforts for robust surveys in this area. Again, as detailed in our attached comments, we remain concerned that other terrestrial invertebrate groups appear to have been ruled out and we would reaffirm that there is potential for other species of conservation concern to be impacted by the proposals.	A terrestrial invertebrate survey was carried out in the summer of 2024. The results are presented in Appendix 8.5 , and species scoped into this report are further detailed in the EIAR Chapter 8 – Terrestrial Ecology at Section 8.6: Baseline Condition.

Fearna Pumped Storage Scheme

Gate Check 1 – Appendix 2

The Proposed Development

2.1 Introduction

This document describes the Proposed Development. The location of the Proposed Development is shown in **Figure 2.1 – Location Plan** and its arrangement is shown in **Figure 2.2 – Scheme Layout**.

2.2 Scheme Description

The principal permanent components of the Proposed Development would be:

- Loch Fearna – the upper reservoir;
- The underground waterway system;
- Loch Quoich – the lower reservoir;
- The powerhouse and switchyard;
- Access tracks and footpaths;
- Temporary construction facilities and borrow pits; and
- Areas of habitat compensation and enhancement.

Loch Fearna (Upper Reservoir)

Two rockfill dams (referred to as Fearna Dam and Coire Dubh Dam) would be constructed to allow the reservoir to store water between the levels of 540m AOD and 600m AOD. This would provide storage of approximately 40 Mm³ of water. The dams would be of similar appearance and construction to the existing Quoich Dam.

An upper control works located within the reservoir would feed water to/from the underground pressure tunnels. The upper control works would comprise two reinforced concrete cylindrical towers, located over each of the vertical tunnel shafts. The towers would be connected by bridges to the Fearna dam and to each other.

Underground Waterway System

Water would transfer between Loch Fearna and Loch Quoich via an underground waterway system comprising:

- two headrace tunnels connecting the Fearna Reservoir to the powerhouse;
- an access tunnel from the powerhouse ground level area to the headrace tunnels and powerhouse shafts lower level; and
- six tailrace tunnels, one between each powerhouse shaft and Loch Quoich.

Loch Quoich (Lower Reservoir)

Loch Quoich is currently used as a storage reservoir for the operational 19MW Quoich hydro scheme and provides approximately 360 Mm³ of water storage for hydro generation. The total volume of Loch Quoich when full is in the region of 560Mm³. The Proposed Development would utilise some of this storage but without affecting the existing operational arrangements for the Quoich hydro scheme. No modifications are required to the existing Quoich dam nor to any of its associated structures and facilities.

Up to six lower inlet/outlet structures, each serving the pump-turbine units, would be constructed on the banks of Loch Quoich adjacent to the powerhouse, to allow water to be abstracted or released as required.

Powerhouse and Switchyard

The powerhouse and switchyard would be located on the shores of Loch Quoich, partially within a disused former quarry which was created in the 1950s to win rock for the Quoich dam. The old quarry

area would be protected from views from the public road by Quoich dam and from the dam itself by a landscaped bund to the east side of the powerhouse and switchyard compound area, formed to replicate the natural surroundings.

The powerhouse would comprise vertical shafts approximately 90m deep which would house the pump-turbine units and ancillary equipment, with a superstructure above. The powerhouse superstructure dimensions would be approximately 400m long by 42m wide by 15m high. The building would be designed to be sympathetic to the surrounding landscape and utilise naturally available materials where possible. It would have a grassed roof and the front elevation would be faced with naturally sourced material from the site to create a vegetated rock facade.

Electrical works associated with connecting the project to the National Grid would also be provided adjacent to the powerhouse within a switchyard sited within the disused quarry. This switchyard would provide the interface between the Proposed Development and the transmission network, with switchgear to allow the isolation of the site from the network during maintenance and faults.

Site Access Tracks and Footpaths

Access tracks would be provided for the construction of the Proposed Development and for operational, maintenance, and emergency access.

The Proposed Development would be accessed for construction and major maintenance from the A87 trunk road at Whitebridge, north of Invergarry. Existing tracks would be utilised wherever possible, subject to upgrading to the standard necessary for the expected construction traffic. Where appropriate, permanent tracks would be reduced in width after completion of construction.

Safe access for recreational users will be maintained throughout the construction and operation of the Proposed Development. Where existing routes are altered by inundation or new structures, alternative routes would be provided, with these in place before the original routes are affected by construction.

The existing forestry junction off the A87 and bridge over the River Garry are unsuitable for the traffic which will need to access the Fearna PSH site via the SAR. For this reason, a new junction and bridge are proposed, linking to the existing track behind the recreational car park at Whitebridge. The existing car park and its access will be retained for recreational users.

The “Southern Access Route” (SAR) would utilise upgraded existing forest tracks through the Glen Garry Forest as far as the existing bridge over the River Kingie. The existing tracks are single track with passing places and would be upgraded by a combination of extending and adding additional passing places and widening to allow for two-way traffic.

From the River Kingie after which a new two-way access track would be constructed to meet the C1144. This would provide full two-lane connectivity between the main site compound and the construction site.

Access to the lower works including the powerhouse site and the construction area within the disused former quarry is proposed via a new junction and access track off the C1144 public road. Upper Reservoir Access Tracks

A new access track would run from the C1144 up to the upper reservoir. Following completion of construction, this track would be reduced in width where possible from 8m wide to 6m wide with passing places, to form an operational access track. Access via the C1144

It is proposed that the ground investigations works, enabling access works and preliminary site mobilisation would require to use the C1144, prior to the SAR linking the site to the C1144 and the commencement of the main construction works, which would then use the SAR. No abnormal loads would be required for these preliminary works and it is anticipated that the upgrades carried out by SSER for the Skye transmission upgrade project prior to commencement would provide sufficient traffic capacity and weight limits to allow access to the Proposed Development site. The Proposed development would not use the C1144 for any heavy vehicles during the main construction period, with these vehicles utilising the SAR.

Areas of Habitat Compensation and Enhancement

The Proposed Development would include a significant package of habitat compensation and enhancement works, both within the site and adjacent landholdings. These would include:

- peatland restoration;
- native tree planting (including riparian planting);
- removal of non-native flora including rhododendron and exotic tree species within areas of Caledonian pine forest;
- habitat restoration and enhancement to promote the successful breeding of species cited in the West Inverness-shire Lochs SPA and SSSI; and
- Habitat restoration and enhancement and other measures to promote an increase in the number of salmon in the River Garry catchment.

These proposals would demonstrably contribute significantly to the enhancement of biodiversity, including restoring degraded habitats and building and strengthening nature networks and the connections between them.

2.3 Mass Balance Strategy

The Proposed Development aims to manage excavated rock and other soil materials to achieve a mass balance, whereby all excavated material would be reused beneficially on site rather than exported. This would minimise the environmental impact of the Proposed Development by avoiding the need to transport bulk materials to the site wherever possible and by minimising the generation of any waste material that would need to be taken off site for disposal. The site presents favourable conditions to achieve this balance, with large volumes of rock available at or near surface and a net requirement to excavate rock, rather than creating a surplus.

2.4 Borrow Pits

The Proposed Development site presents excellent potential for borrow pits and preliminary calculations suggest that there are sufficient volumes of suitable rock available to construct the Proposed Development without the import of any rock or aggregate.

The proposed borrow pits are generally adjacent to the works areas, such as adjacent to the dams and alongside the access tracks. The exact location of borrow pits would be micro-sited depending upon site surveys with respect to availability of suitable material and proximity to where it is required, as well as any environmental sensitivities.

2.5 Construction Compounds

A number of site compounds would be required to accommodate the construction site establishment and lay down areas, as well as a workers' residential camp. The locations of these compounds are shown in Figure 2.2 – Scheme Layout. The following primary construction compounds are proposed:

- The main site compound and workers' accommodation camp, adjacent to the SAR;
- A compound at the powerhouse area; and
- A compound at the Fearna reservoir area.

2.6 Site Traffic

Construction traffic to the Proposed Development would take access from the A76 at Whitebridge. Operational and maintenance traffic would also utilise this access route or the C1144.

2.7 Construction Environmental Management

Construction Environmental Management Processes

Construction mitigation and environmental protection measures would be managed through a suite of documents under the umbrella of a Construction Environmental Management Document (CEMD). The CEMD would apply to all construction activities and be implemented via the Contractors' Construction Method Statements. In particular, the CEMD would specify conditions relating to protection of habitats and species, pollution prevention and the means by which site monitoring would occur. The final site-specific CEMD would be drawn up by the Applicant, in consultation with the Highland Council (THC), Scottish Environment Protection Agency (SEPA), and NatureScot, once planning permission had been obtained and the main contractor appointed.

Construction will be supervised and monitored by specialist advisers including Ecological Clerks of Works (ECoWs) to ensure that sensitive ecological habitats and species are adequately protected in accordance with the methodologies in the CEMD and associated documents.

Micro-siting

There may be a requirement to micro-site elements of the Proposed Development from the positions shown on **Figure 2.2 – Scheme Layout**, as a result of additional constraints encountered during site works. Any micro-siting would require agreement of the specialist advisers (e.g. the ECoW) as appropriate.

Site Environmental Management

The Construction Main Contractor would have overall responsibility for environmental management on the Site. The services of specialist advisors, such as the project ECoW, would be retained as appropriate to be called on as required to advise on specific issues. The Main Contractor and the Applicant would ensure construction activities are carried out in accordance with the mitigation measures outlined in this EIA Report and those detailed in the approved CEMD.

Site Reinstatement

Reinstatement would be undertaken as soon as practical following the construction works in each area. Site tracks and some hardstanding areas would be retained for use during maintenance operations, although the upper reservoir access track would be reinstated to 6 m with passing places. All construction equipment and other temporary infrastructure would be removed from site and the temporary storage areas would be reinstated.

2.8 Land Take

It is estimated that the maximum permanent development footprint of the Proposed Development would be approximately 135ha. During the construction period it is estimated that a further 20ha would be temporarily required which would be reinstated following completion of the construction works.

2.9 Lighting

Construction Lighting

For safety reasons, temporary lighting would be required for all external construction activities during hours of darkness and low natural light. Lighting would also be required at the construction compounds. This lighting would be designed to minimise illumination, glare or light spillage to nearby receptors.

Operational Lighting

Once operational, external lighting would only be provided at key areas, such as the powerhouse and switchyard but would only be used during essential operational and maintenance activities, for

example if a switching operation was necessary in the external switchyard. No lighting would be operated by PIRs. Infrared Aviation safety lighting on the dams and powerhouse.

2.10 Electric Car Charging Point Strategy

Wherever practicable, vehicles used in the operation of the Proposed Development would be electric vehicles (EVs). The powerhouse would be provided with sufficient charging points for all vehicles used to operate the scheme, as well as for staff vehicles to recharge whilst at work.

2.11 Project Operation and Maintenance

The Proposed Development would be manned twenty-four hours a day, with most operations being controlled from the control building within the powerhouse or remotely. Regular visits would be made to inspect and maintain the scheme components.

2.12 Project Decommissioning

With proper maintenance, the Proposed Development should remain functional indefinitely and as such an assessment of decommissioning effects has not been provided as part of the EIA Report.