

FEARNA STORAGE

Fearna Pumped Storage Hydro Scheme - EIA Report

Additional Information

Additional Information Report

December 2025



Quality Information

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1.1 Introduction

Background Information

- 1.1.1 In February 2025, Fearna PSH Ltd, the “Applicant”, a joint venture between Gilkes Energy and SSE Renewables, applied to the Energy Consents Unit (ECU) of the Scottish Government under Section 36 of the Electricity Act 1989 for indefinite consent, together with a direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 for deemed planning permission, to be granted to construct and operate the Fearna Pumped Storage Hydro (PSH) scheme located in Glengarry, approximately 23km to the west of Invergarry.
- 1.1.2 An Environmental Impact Assessment (EIA) Report was provided with the application detailing the likely significant effects of the Proposed Development. Other documents submitted in support of the application included a Planning Statement, a Shadow Habitats Regulation Appraisal and a Non-Technical Summary of the EIA Report.
- 1.1.3 Since submitting the Section 36 Application, the Applicant has continued to engage with statutory and non-statutory consultees. Responses from these consultees have required the Applicant to prepare and submit Additional Information to support the assessment of the application, which is provided within this report and appendices.
- 1.1.4 The Additional Information Report has been prepared by the Developer, Gilkes Energy Ltd, supported as required by the same team of specialist consultants that carried out the EIA.

Purpose of the Additional Information Report

- 1.1.5 This document provides details of minor changes to the Proposed Development together with additional environmental information which responds to the queries and responses received. The Additional Information is structured to address specific technical areas where clarification or additional information has been requested.

Structure of the Additional Information Report

- 1.1.6 The Additional Information Report comprises:

Section 1.1 - Introduction

- 1.1.7 This introduction.

Section 1.2 - Changes to the Proposed Development

- 1.1.8 Since the submission of the application for consent under Section 36 of the Electricity Act 1989 in February 2025, whilst there is no significant change to the description of the development in the application and the key elements and substance of the development remain the same, the detailed arrangement of parts of the built development have been modified to reduce their visual impact. This section describes those changes.

Section 1.3: Additional Habitat Enhancement Proposals

- 1.1.9 Details of significant increases to the habitat enhancement proposals, with an increased focus within Wild Land Area 18 (WLA 18) and the site boundary, including further peatland restoration, native woodland restoration and planting, eradication of invasive non-native species, deer density reduction, river sediment augmentation and other measures to support Atlantic salmon and other aquatic species.

Section 1.4 - Additional Habit Enhancement for Common Scoter and Black-throated Diver

- 1.1.10 Details of additional habit enhancement measures to support Common Scoter and Black-throated Diver within the West Inverness-shire Lochs SPA.

Section 1.5 - Water Temperature Modelling

- 1.1.11 Additional temperature recording and a 3D numerical modelling study have been carried out to gather baseline data and then predict any potential effects of the operation of the Proposed Development on the temperature regime of Loch Quoich and the downstream river system.

Section 1.6 - Geomorphological Assessments

- 1.1.12 Geomorphological assessments of the main PSH site and the Southern Access Route.

Section 1.7 - River Garry Sediment Augmentation Study

- 1.1.13 A sediment augmentation feasibility study for the River Garry below the Invergarry Dam, which informs the proposed provision of improved spawning conditions for Atlantic Salmon.

Section 1.8 - Temporary Construction Drawdown

- 1.1.14 This describes the modelling of the temporary drawdown of Loch Quoich during construction of the Proposed Development.

Section 1.9 – Loch Fearn Common Scoter Habitat Suitability

- 1.1.15 An advice note has been prepared on the suitability of habitats at Loch Fearn for Common Scoter.

Section 1.10 - Temperature Rise Effects on Aquatic Invertebrates

- 1.1.16 An advice note has been prepared on temperature rise effects on invertebrates in the Gearr Garry and Loch Garry.

Section 1.11 - Response to RSPB Objection

- 1.1.17 A response to the RSPB's 6 June 2025 objection to the Proposed Development; and

Section 1.12 – Conclusion

- 1.1.18 A conclusion.

Notification and Availability of the Additional Information Report

- 1.1.19 A copy of the additional information will be served on the Highland Council as planning authority in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017).
- 1.1.20 The additional information will be advertised in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, as follows:
- The Edinburgh Gazette;
 - The Lochaber Times; and
 - The project website, www.fearnastorage.co.uk/.

- 1.1.21 Copies of the Additional Information, the Application and the EIA Report ('the information') will be available for public inspection in person, free of charge, during normal opening hours at:
- The Highland Council Headquarters, Inverness; and
 - Invergarry Post Office
- 1.1.22 The Additional Information, together with the original EIA report can also be viewed at the at the following websites:
- <https://fearnastorage.co.uk/>
 - <http://www.energyconsents.scot/>
 - <http://wam.highland.gov.uk/wam/>

Updates to EIA Report

- 1.1.23 **Table 1** summarises updates to the EIA Report (EIAR) submitted as Additional Information.

ElAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
Chapter 1 - Introduction	None.	None.	No Additional Information required.
Chapter 2 -The Proposed Development	Whilst there is no significant change to the description of the development in the application and the key elements and substance of the development remain the same, the detailed arrangement of some parts of the built development have been modified.	The changes have been variously proposed in response to feedback from The Highland Council (THC), NatureScot, the Ness District Salmon Fishery Board (NDSFB) and the RSPB to reduce the visual impact of the Fearna Reservoir, in particular within WLA 18, to reduce ecological impacts, to reduce traffic impacts and to increase the habitat enhancements provided by the Proposed Development.	Changes to the Proposed Development as described in Volume 1, Chapter 2: The Proposed Development of the EIA Report are provided in the Additional Information Report at Section 1.2 – Changes to the Proposed Development. The changes include removal of the visible upper control works structures, removal of the spillway channel and access bridge from the Fearna dam, reinstatement of the existing Allt a' Mheil hydro access track, adjustments to the arrangement of the underground tunnel system, revisions to the temporary works associated with the widening works of 2.5km of the C1144, provision of a landform screening bund between the Southern Access Route (SAR) and Loch an Staic, and provision of additional habitat enhancement measures. Revised or new figures are provided to describe these changes, which are detailed in Section 1.2 - Changes to the Proposed Development, below.
Chapter 3 - Consideration of Alternatives and Design Evolution	Minor design evolution changes are covered in Chapter 2 above.	None.	No Additional Information required.
Chapter 4 - Assessment Methodology, Scoping and Consultation	None.	Post-submission consultation and formal responses from the following consultees have led to the provision of the Additional Information in this document: The Highland Council (THC), NatureScot, the Ness District Salmon Fishery Board (NDSFB) and the RSPB.	Links between the post-submission consultation and formal responses and Additional Information provided in the Applicant's response are covered under the relevant technical chapters lower in this table.

EIAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
		Other consultation responses have been received which are not referred to in this Additional Information as they do not raise any issues which require Additional Information to be provided.	
Chapter 5 - Planning and Policy Context	None.	None.	No Additional Information required.
Chapter 6 - Hydrology and Water Management	None, but further detail is provided of the temporary works arrangements for constructing the PSH lower control works (including drawdown of Loch Quoich), potential effects of the operation of the PSH on the temperature regime of Loch Quoich and the downstream river system, and the geomorphology of the Fearna Reservoir.	During consultation with NatureScot, the NDSFB and the RSPB, concerns were raised regarding the potential impacts of the following: - temporary construction dewatering of Loch Quoich on the River Garry catchment downstream of the Quoich Dam; - potential effects of the operation of the PSH on the temperature regime of Loch Quoich and the downstream river system; and - effects of any potential increase in sedimentation of water in Loch Fearn, which could be transferred to Loch Quoich and thence to the River Garry catchment downstream.	In response to these requests, Additional Information has been provided as follows: - details of the proposed temporary water management arrangements for Loch Quoich to facilitate the construction of the lower control works are detailed in the Additional Information Report, Section 1.8 – Temporary Construction Drawdown. This replaces paragraph 2.7.5 in Chapter 2 – The Proposed Development of the EIA Report. - Survey and modelling of the operation of the PSH on the temperature regime of Loch Quoich and the downstream river system are included at Section 1.5 - Water Temperature Survey and Modelling of the Additional Information Report below. - Whilst the methodology described in the EIA Report at Appendix 2.2 – Outline CEMD remains valid, the Additional Information provided at Section 1.6 – Geomorphology, below, provides further survey and detail of the proposed measures to manage sediment within the Loch Fearn catchment.

EIAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
Chapter 7 – Landscape and Visual	Some of the changes detailed at Chapter 2 above have been put forward to reduce the landscape and visual impact of the Proposed Development. Whilst these significantly reduce the environmental impacts further, they do not materially change the overall conclusions presented in this Chapter of the EIA report.	NatureScot's letter of 4 September 2025: • Objects to the Proposed Development due to significant adverse effects on the qualities of WLA 18; • Advises that the proposal will not have an adverse effect on the integrity of Knoydart NSA or the objectives of the designation; and • Advises they have considered other interests, including the proposal's potential for biodiversity enhancement, and taken them into account in reaching their conclusion on this proposal. THC's objection letter dated 27 October 2025 includes: •the development would have a significantly detrimental landscape and visual impact including cumulative effects; and • The proposed development would have significant adverse effects on the qualities of Kinlochhourn – Knoydart – Morar Wild Land Area, Knoydart National Scenic Area, Moidart, Morar and Glen Shiel Special Landscape Area and the underlying LCTs which make up its special qualities; and it would have a significant adverse effect on recreational receptors on surrounding routes and upland locations.	Section 1.2 of the Additional Information includes information on changes to the detail of the arrangement of the Proposed Development that have been introduced to mitigate its landscape and visual impact. These include removal of the visible upper control works structures, removal of the spillway channel and access bridge from the Fearna dam, reinstatement of the existing Allt a' Mheil hydro access track, and provision of additional habitat enhancement measures which also have a landscape benefit. In response to NatureScot's comment on the proposal's potential for biodiversity enhancement, a very significant increase in the scope of this is now proposed, described in the Additional Information Report at Section 1.3 – Additional Habitat Enhancement Proposals.
Chapter 8 – Terrestrial Ecology	Whilst not strictly a change to the layout of the Proposed Development, as the key elements of the built development are largely unaltered, the package of habitat enhancements described in the EIAR at Appendix 8.7 - OBEMP has been significantly increased. Whilst this significantly reduces the environmental impacts further, it	The package of habitat enhancements has been increased in response to NatureScot's objection letter dated 4 September 2025 (see for Chapter 7 above).	A very significant increase in the scope the biodiversity enhancement package is now proposed, described in the Additional Information Report at Section 1.3 – Additional Habitat Enhancement Proposals.

EIAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
	does not materially change the overall conclusions presented in this Chapter of the EIA report.		
Chapter 9 - Forestry	None.	None.	No Additional Information Required.
Chapter 10 - Ornithology	Whilst not strictly a change to the layout of the Proposed Development, as the key elements of the built development are largely unaltered, the package of habitat enhancements described in the EIAR at Appendix 8.7 – OBEMP, including measures specifically targeted to benefit Common Scoter and Black-throated Diver, has been significantly increased. Whilst this significantly reduces the environmental impacts further, it does not materially change the overall conclusions presented in this Chapter of the EIA report.	Post-submission consultation has taken place with both NatureScot and the RSPB in relation to ornithological interests. NatureScot requested clarity on habitat enhancements, and for those associated with the West Inverness-shire Loch SPA to be separately identified to the remainder. A formal objection was submitted by the RSPB to the ECU, which is attached to this report, together with the Applicant's response.	The following Additional Information has been provided in relation to ornithology: • Additional Habitat Enhancements for Common Scoter and Black-throated Divers are included at Section 1.4 to the Additional Information Report. • The other biodiversity enhancements provided by the Proposed Development, described in the Additional Information Report at Section 1.3 – Additional Habitat Enhancement Proposals, would also be beneficial to Common Scoter and Black-throated Divers. • An advice note was prepared by Mike Coleman, the project's ornithology specialist on the suitability of habitats at Loch Fearn for Common Scoter and is included in the Additional Information Report at Section 1.9. • A copy of the RSPB objection to the Proposed Development including the Applicant's response is at Section 1.11, with a separate appendix for the sensitive and therefore confidential section.
Chapter 11 – Aquatic Ecology	Whilst not strictly a change to the layout of the Proposed Development, as the key elements of the built development are largely unaltered, the package of habitat enhancements described in the EIAR at Appendix 8.7 - OBEMP, including	During consultation with and in formal responses from NatureScot, the NDSFB and the RSPB, Additional Information and additional habitat enhancement measures were requested on the following matters relating to aquatic ecology:	The following Additional Information has been provided: • Survey and modelling of the operation of the PSH on the temperature regime of Loch Quoich and the downstream river system are

EIA Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
	measures specifically targeted to benefit Atlantic salmon and other aquatic species, has been significantly increased. Whilst this significantly reduces the environmental impacts further, it does not materially change the overall conclusions presented in this Chapter of the EIA report.	• Potential effects of the operation of the Proposed Development on the existing temperature regime of Loch Quoich and the River Garry waterbodies downstream of the Quoich Dam; • The effect of any predicted temperature rises on the invertebrate populations of the River Garry system; • The effect of any temporary construction drawdown of Loch Quoich on the river system downstream of the Quoich Dam; • effects of any potential increase in sedimentation of water in Loch Fearn, which could be transferred to Loch Quoich and thence to the River Garry catchment downstream; and • The adequacy of the habitat compensation measures proposed in the EIA Report at Appendix 8.7 – OBEMP.	included at Section 1.5 - Water Temperature Survey and Modelling of the Additional Information Report below. • The effects of any predicted temperature rises on the invertebrate populations of the River Garry system are covered in the Additional Information Report at Section 1.10 – Temperature Rise Effects on Aquatic Invertebrates (below); • Details of the proposed temporary water management arrangements for Loch Quoich to facilitate the construction of the lower control works are detailed in the Additional Information Report, Section 1.8 – Temporary Construction Drawdown. This replaces paragraph 2.7.5 in Chapter 2 – The Proposed Development of the EIA Report. • Whilst the methodology described in the EIA Report at Appendix 2.2 – Outline CEMD remains valid, the Additional Information provided at Section 1.6 – Geomorphology, below, provides further survey and detail of the proposed measures to manage sediment within the Loch Fearn catchment. • In response requests to increase the biodiversity enhancement provided by the Proposed Development, a very significant increase in the scope of this is now proposed, described in the Additional Information Report at Section 1.3 – Additional Habitat Enhancement Proposals. This includes many measures identified to support Atlantic salmon and other aquatic species and habitats, including a proposal for sediment enhancement to the Lower River Garry. The survey and feasibility proposal for this is included in the Additional Information Report

ElAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
			at Section 1.7 – River Garry Sediment Augmentation Study.
Chapter 12 – Geology, Soils and Water	There is no material change to the layout of the Proposed Development in relation to geology, soils and water requiring Additional Information and there is no change to the assessment findings in this chapter of the ElAR.	None.	No Additional Information Required.
Chapter 13 – Land Use	None.	None.	No Additional Information Required.
Chapter 14 – Recreation and Access	As for Chapter 7 above, some of the changes detailed at Chapter 2 above have been put forward to reduce the landscape and visual impact of the Proposed Development. Whilst this significantly reduces the environmental impacts further, it does not materially change the overall conclusions presented in this Chapter of the EIA report.	None.	The detail of the arrangement of the Proposed Development that have been introduced to mitigate its landscape and visual impact in Section 1.2 of the Additional Information (see Chapter 7 above) would have a positive effect on the recreational receptors
Chapter 15 – Transport and Access	Whilst there is no change permanent works associated with the Proposed Development, changes to the temporary works arrangements for constructing the widening of 2.3km of the C1144 have been proposed. Whilst this significantly reduces the environmental impacts further, it does not materially change the overall conclusions presented in this Chapter of the EIA report.	THC's objection letter dated 27 October 2025 includes: The proposed development would have significant adverse impacts on the local road network, and the mitigation proposed does not adequately address these impacts.	Changes to the temporary works arrangements for constructing the widening of 2.3km of the C1144 have been proposed in order to reduce any disruption to the few residents and other users of this section of road whilst the widening works is completed. These are detailed in the Additional Information Report at Section 1.2. There is no change to the permanent works for the widening of the C1144, which remains as described in the EIA Report at Chapter 2 – The Proposed Development.
Chapter 16 – Noise and Vibration	None.	None.	No Additional Information Required.

ElAR Chapter	Changes to the layout of the Proposed Development requiring Additional Information	Further Consultation and Consultation Responses requiring Additional Information	Additional Information
Chapter 17 – Socioeconomics and Tourism	None.	None.	No Additional Information Required.
Chapter 18 – Cultural Heritage	None.	None.	No Additional Information Required.

1.2 Changes to the Proposed Development

- 1.2.1 Since the submission of the application for consent under Section 36 of the Electricity Act 1989 in February 2025, whilst there is no significant change to the description of the development in the application and the key elements and substance of the development remain the same, the detailed arrangement of parts of the built development have been modified to reduce their visual impact. This section describes those changes.
- 1.2.2 The changes included in the Additional Information are shown in the figures listed in **Table 2** below, either as revisions to the 28 February 2025 EIA Report figures, or as new figures (Figures 2.43 E2 and 2.44 E2). The Additional Information figures have the issue suffix E2.

Table 2 – List of Revised or New Figures

Figure 1.1 E2	Scheme Arrangement with Grid References
Figure 2.2 E2	Scheme Layout
Figure 2.3 E2	Scheme Layout (Aerial)
Figure 2.4 E2	Upper Reservoir - Plan
Figure 2.5 E2	Fearna Dam - CFRD Plan and Elevation
Figure 2.6 E2	Coire Dubh Dam - GA
Figure 2.7 E2	Upper Control Works GA
Figure 2.10 E2	Lower Quioch Reservoir - Plan
Figure 2.11 E2	Powerhouse and Lower Control Works GA
Figure 2.12 E2	Powerhouse Area Plan
Figure 2.13 E2	Powerhouse Typical Cross Section
Figure 2.14 E2	Southern Access Route Upgrades (Sheet 11 only)
Figure 2.19 E2	C1144 Road Widening - Overall Plan & Sheets 1-5
Figure 2.20 E2	C1144 Widening Details (Sheets 1 to 3)
Figure 2.23 E2	Powerhouse Temporary Construction Access
Figure 2.33 E2	Borrow Pit BP1 - Plan
Figure 2.34 E2	Borrow Pit BP1 - Sections
Figure 2.35 E2	Borrow Pit BP2 - Plan
Figure 2.36 E2	Borrow Pit BP2 - Sections
Figure 2.37 E2	Borrow Pit BP3 - Plan
Figure 2.38 E2	Borrow Pit BP3 - Sections
Figure 2.43 E2	Southern Access Route Widening and Bund Details at Loch an Staic
Figure 2.44 E2	Southern Access Route - C1144 Temporary Offline Route
Figure 8.7.1 E2	Compensatory and Biodiversity Enhancement Plan

- 1.2.3 The changes included in the Additional Information are also shown in the revised visualisations in **Table 3** below, in both the NatureScot and Highland Council formats. Only those visualisations that would be affected by the proposed changes have been updated.

Table 3 – List of Updated Visualisations

Figure V3a VL3	Gleouraich-Revised Scheme Design-Year 15 (NS)
Figure V3a VL4	Spidean Mialach-Revised Scheme Design-Year 15 (NS)
Figure V3a VL5	Gairich-Revised Scheme Design-Year 15 (NS)
Figure V3a VL8	Sgùrr Mhurlagain-Revised Scheme Design-Year 15 (NS)
Figure V3b VL3	Gleouraich-Revised Scheme Design-Year 15 (THC)
Figure V3b VL4	Spidean Mialach-Revised Scheme Design-Year 15 (THC)
Figure V3b VL5	Gairich-Revised Scheme Design-Year 15 (THC)
Figure V3b VL8	Sgùrr Mhurlagain-Revised Scheme Design-Year 15 (THC)

1.2.4 The changes have been variously proposed in response to consultee feedback in order to reduce the visual impact of the Fearna Reservoir, in particular within WLA 18, to reduce ecological impacts, to reduce traffic impacts, to increase the habitat enhancements provided, and to reflect other minor changes to the design of the underground works following ongoing design development.

1.2.5 The changes are described below.

Removal of the Visible Upper Control Works Structures

1.2.6 In order to reduce the landscape and visual impact of the Fearna Reservoir upper control works, the two circular reinforced concrete intake towers linked to the Fearna dam and to each other by steel gantries have been removed and replaced with structures that are within the body of the Fearna Dam and permanently submerged within the reservoir below its lowest operating water level.

1.2.7 The preliminary hydraulic design which was conducted pre-planning required that vertical pressure shafts were required to drop directly from the upper reservoir, to avoid vacuum occurring in the underground waterway system. This scenario must be avoided in the operation of pumped storage hydro plants.

1.2.8 Vertical upper control works structures were required accordingly, located directly above the pressure shafts. These structures would provide the following functions:

- Screening to prevent debris entering the tunnel system
- Isolation gates to shut off the flow to the tunnels
- Access, lifting and control equipment

1.2.9 The upper control works structures would have been approximately 80m high, 20m in diameter and constructed from reinforced concrete. The screen structures at the base would be 32m in diameter to create the required screen area, however this wider base section would have been permanently submerged within the upper reservoir. When the reservoir was full, approximately 10m of the silos would have been exposed above the water. This would increase to 70m when the reservoir was empty.

1.2.10 The location of the pressure shafts and thus the upper control works was originally required to be separate from the dam structures. Gantry structures with supporting piers would therefore have been required to access them, which would have been designed to take HGV loads. The gantries would have been located above maximum water level and therefore always been visible. **Plate 1** and **Plate 2** below describe the details of the originally submitted S36 design:

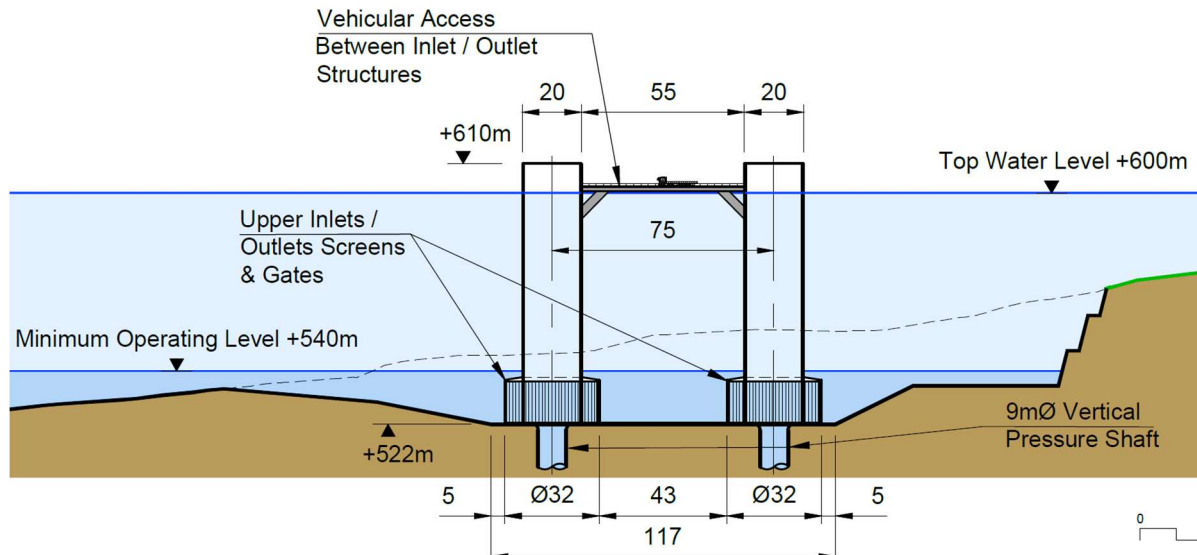


Plate 1 – Upper Control Works – Cross section

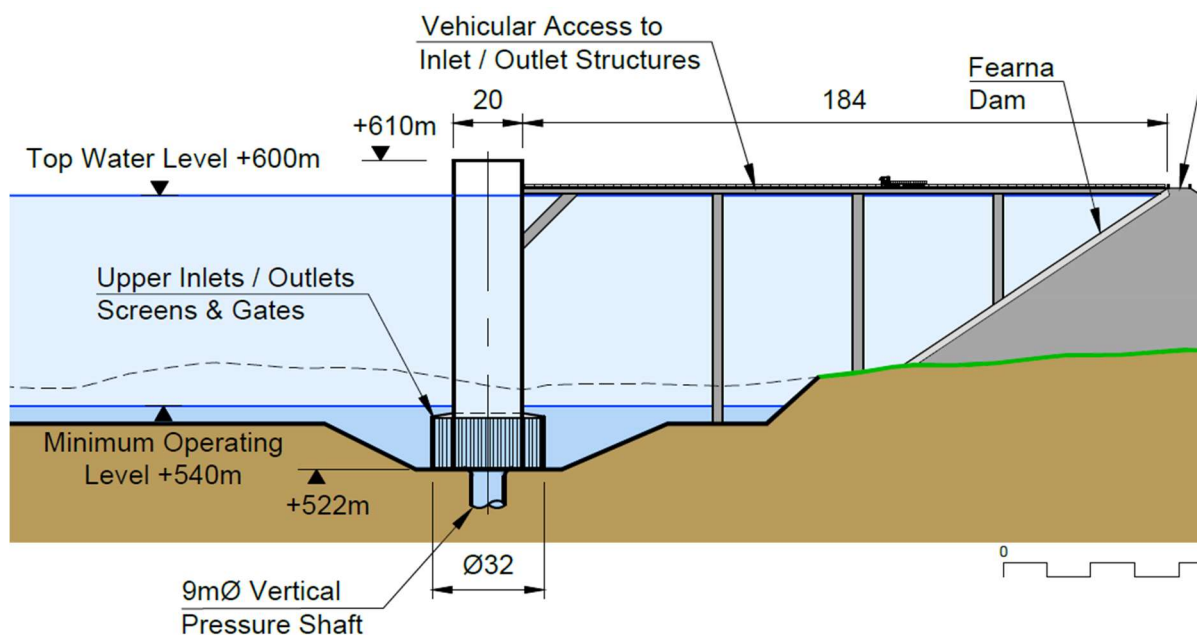


Plate 2 – Upper Control Works – Section including Fearna Dam

- 1.2.11 The development and refinement of the design have identified alternative feasible options which do not require separate upper control works structures. Instead, the screen and isolation gate requirements can be accommodated within the Fearna dam structure. The screens would be permanently submerged at or near the base of the dam and the gate shaft would be constructed within the rockfill dam section. As a result, none of this infrastructure would be visible. This would remove these significant structures and associated vehicle access gantries from the upper reservoir and from within WLA 18.
- 1.2.12 The revised arrangement is shown in **Plate 3** and **Plate 4** below, and in the updated **Figure 2.7 E2**.

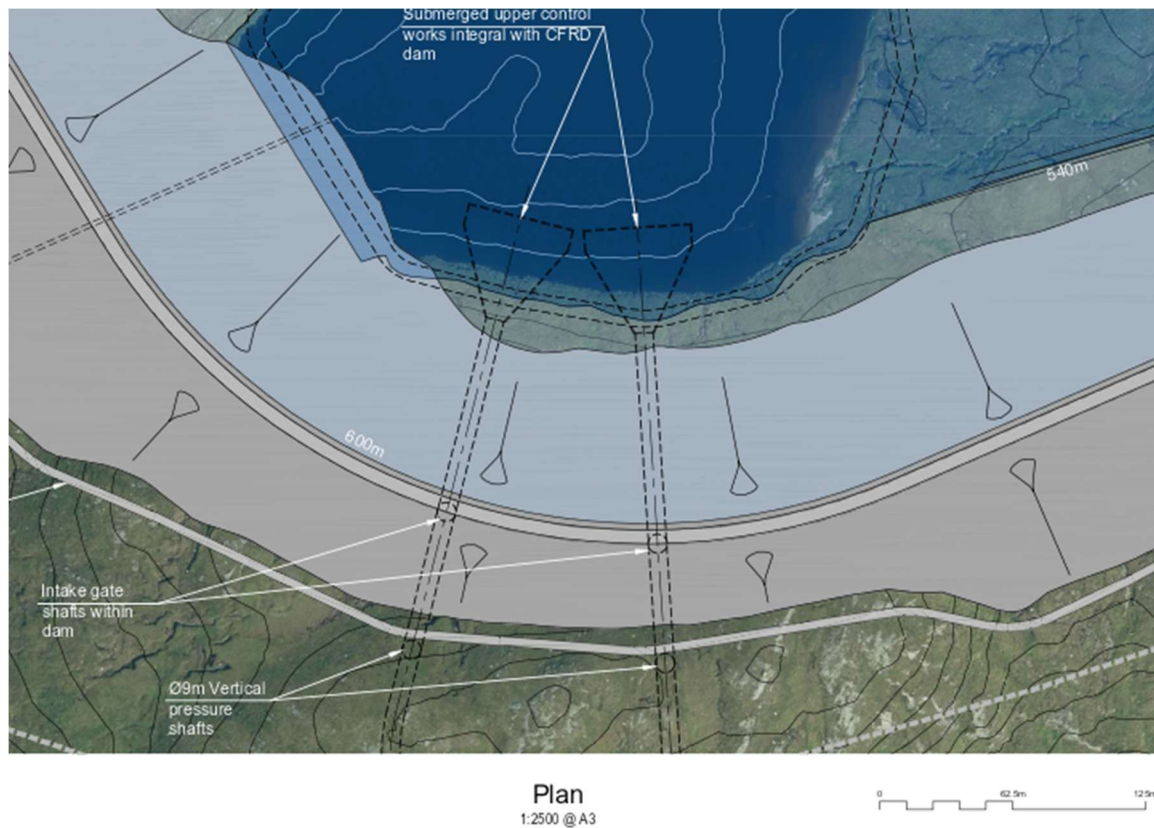


Plate 3 – Upper Control Works – Plan on Revised Design

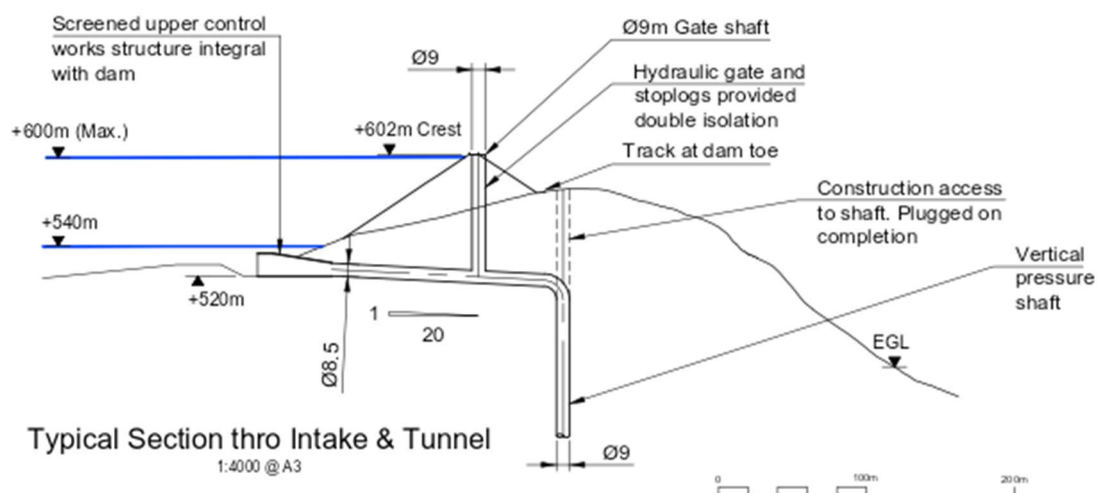


Plate 4 – Upper Control Works – Section through Revised Design

- 1.2.13 The visualisations from the locations from which the original intake structures would have been visible have been revised to show the new proposed arrangement for the upper control works. These are attached in the figures listed in **Table 3** above.
- 1.2.14 Whilst the dams and reservoir would still form notable features in the landscape and would contribute to significant landscape and visual effects, the removal of the intake towers and gantries would create a simpler composition and would remove some of the more distracting elements.

Removal of the spillway channel and access bridge from the Fearna dam.

- 1.2.15 Only one spillway is required for the Fearna Reservoir, and this has been retained on the Coire Dubh dam.
- 1.2.16 Spillway channels are required on dams to pass flood flows and additionally on pumped storage hydro schemes they may also pass additional flows in overpumping events. Any water passing over the spillway requires to be returned to the watercourse downstream. The spillway channels would require to be approximately 500m long and 10m wide by 10m deep. For reference, this is almost identical to the spillway arrangement at the existing Quoich Dam as shown in **Plate 5** below.

**Plate 5 - Quoich Dam spillway and channel**

- 1.2.17 At planning design stage, it was considered robust to provide spillways and spillway channels at both the Fearna and Coire Dubh dams, due to the preliminary nature of the design. The dam designs have been developed since submission of the Section 36 application March 2025, and it has been concluded that only one spillway channel would be required. The preferred location for this would be at the western end of the Coire Dubh dam. The rationale for this decision is based on the following:
- The catchments and thus flood flows are relatively very small and can be passed via a single spillway, as could any overpumping flows, should these be required to be accommodated;
 - The Coire Dubh dam is less prominent in the landscape than the Fearna dam and the western end is least visible, furthest away from the hillwalking routes; and
 - The geological conditions in this location are preferred, with exposed rock at surface.
- 1.2.18 Removal of the Fearna dam spillway and channel removes a major piece of visible infrastructure from the south-facing slope immediately downstream of the Fearna dam and within WLA18, which would reduce the physical effect on the landscape area downstream of the dam. This also helps to simplify the appearance of the downstream face of the Fearna dam as a feature in the landscape. The main access track to the upper reservoir requires to cross this channel and its removal also allows a proposed bridge structure to be removed from the design.

- 1.2.19 The revised arrangement of the Fearna Dam is shown in the updated **Figures 2.2 E2, 2.3 E2, 2.4 E2, 2.5 E2 and 2.7 E2**.
- 1.2.20 The visualisations from the locations from which the original intake structures would have been visible have been revised to show the new proposed arrangement for the upper control works. These are attached in the figures listed in **Table 3** above.

Fearna Reservoir Borrow Pits Rock Excavation Level

- 1.2.21 Borrow Pits BP1, 2 and 3, which are located within the footprint of the Fearna Reservoir, have had their top rock excavation level raised from 10m below the reservoir drawdown range to 2m above it. The reason for this is to avoid retaining peat and other superficial ground material from within the reservoir drawdown, thereby reducing the potential for this material to become suspended in the water due to the action of drawdown and waves.
- 1.2.22 The revised arrangement is shown in **Figures 2.33 E2 to 2.38 E2**.

Reinstatement of the Allt a' Mheil Hydro Track

- 1.2.23 The existing 500kW Allt a' Mheil hydropower scheme is located downstream of the proposed Coire Dubh dam. The intake structure on the Allt a' Mheil burn is accessed via an access track of the C1144 public road. This track is a poor example of an upland access track due to the following:
- Very steep gradient of up to 1:5 in places, which creates unsafe conditions both when ascending and descending, especially in poor weather;
 - Poor alignment – the track generally runs straight up the steep hillside, rather than using the natural contours;
 - Poor reinstatement – very thin soils were placed on the verges and the underlying granular material shows through. Revegetation has therefore been substandard;
 - Poor drainage – runoff flows down the track on the steep sections, causing washout of the material. On shallower sections, ponding occurs due to lack of crossfall and poor roadside ditches;
 - Surface – loose gravel material has been used, which dislodges due to runoff and wheelspin on the steep sections;
 - Poorly reinstated borrow pit; and
 - Pipe laydown area left un-reinstated at the lower end.

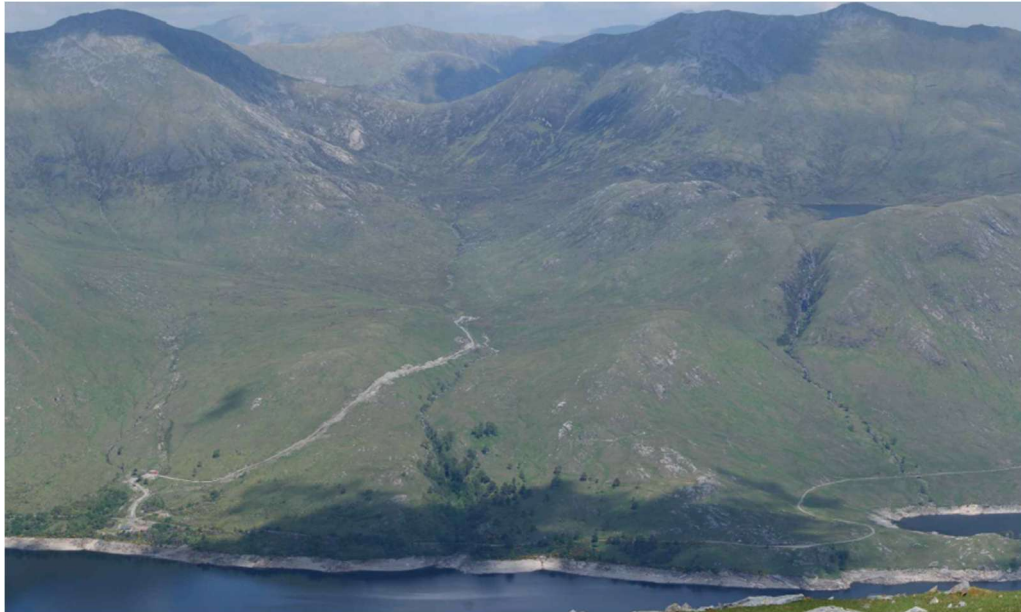


Plate 6 – Allt a' Mheil track viewed from Gairich summit



Plate 7 – Poor reinstatement, steep gradient and lacking drainage

- 1.2.24 The issues identified above create greater visual impact than a properly designed and well reinstated upland access track.
- 1.2.25 The pressure pipeline is buried within the verge of the access track, including several air valves, which require to be accessed for periodic maintenance. It is therefore proposed to reinstate the access track to remove it as a visible feature within the landscape. During future maintenance, the air valves and pipeline can be accessed by Argo or small excavator without the requirement for a track.
- 1.2.26 The proposed Fearna access track would pass very close to the Allt a'Mheil intake and therefore the Allt a'Mheil operator would use the Fearna track for routine maintenance.

This would also provide a significantly safer option than the current track and the landowner agreements have included this provision.

- 1.2.27 This measure would both provide on-site improvement of the cumulative visual impact of access tracks within the WLA designation and improve biodiversity.

Adjustments to the arrangement of the underground tunnel system

- 1.2.28 Minor adjustments to the arrangement of the underground tunnel system are proposed which would have no material impact on the above-ground appearance of the Proposed Development.

Revisions to the temporary works associated with the widening works of 2.5km of the C1144

- 1.2.29 In response to concerns raised by THC Transport Planning, revisions are proposed to the temporary works associated with the widening works approximately of 2.3km of the C1144 public road in the vicinity of the main PSH site.

- 1.2.30 The following three measures, which are illustrated in the attached **Figure 2.44 E2 and 2.23 E2**, are proposed to mitigate disruption to traffic over this stretch of road during the widening work:

- Between Quoich dam and the powerhouse site an offline temporary surfaced road would be provided that would be dedicated for public use for the duration of the construction, approximately 1km in length. This would leave the C1144 carriageway free to allow the widening works to be undertaken in this section without disruption to the public or Skye transmission upgrade works, should these still be ongoing in the Glengarry area. The existing C1144 carriageway would be used by construction vehicles and would also provide a working area for the rock excavation adjacent to the Quoich dam.
- Linking the west end of the powerhouse area to the upper reservoir track. This would allow construction vehicles to access the powerhouse area in the initial stages without requiring the C1144 widening between the powerhouse and start of the hill track. For clarity, it is still proposed to widen the C1144 between the powerhouse and hill track, as the powerhouse area would become very constrained, but this can be done later in the programme i.e. when the Skye transmission upgrade works in this area are fully complete.
- East of the Quoich dam additional areas of temporary widening that will allow the C1144 widening works to progress whilst keeping the C1144 open are proposed.

- 1.2.31 The above measures would provide significant improvements to temporary access and mitigate disruption along the full length of the 2.5km widening works. These works could be undertaken without significant road closures, which if required could be done overnight without disrupting daytime access to the west of the Quoich dam. A good example of a similar road widening scheme is the widening of the A832 at Loch Bad an Scalaig between Achnasheen and Gairloch, which involved major rock excavation work in constrained topography, and where we understand that traffic flows were maintained throughout the work.

Provision of a landform screening bund between the Southern Access Route (SAR) and Loch an Staic

- 1.2.32 To reduce potential disturbance of sensitive avian receptors on and around Loch an Staic by construction traffic using the SAR, a landform screening bund is proposed over a length of approximately 770m. Details are given **Plate 8** below and in **Figures 2.14 E2 (Sheet 11) and 2.43 E2**.
- 1.2.33 The construction of the bund would comprise the excavation of granular material immediately adjacent to the existing forest road, on the northern side. This material

would be deposited on the existing roadway to create the bund, with the new section of forest road running through the excavated area, screened from Loch an Staic. Peat, turf and topsoil would from the excavation would be used to reinstate and vegetate the screening bund.

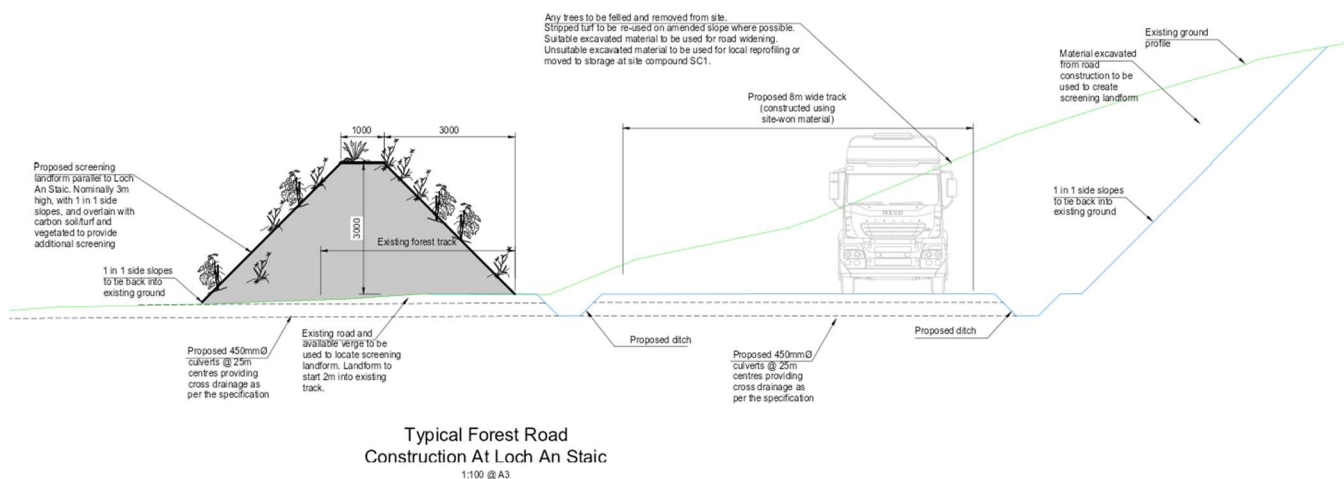


Plate 8 – Section through SAR Screening Bund at Loch an Staic

Provision of additional habitat enhancement measures.

- 1.2.34 Provision of additional habitat enhancement measures are described in detail in Sections 1.3 and 1.4 below. The measures described here are those specifically around the upper reservoir and its access track.
- 1.2.35 Further opportunities to create areas of on-site native woodland have been identified, which would improve the landscape and visual impact of both the Fearn PS and the Skye 132kV transmission infrastructure. Additionally, this would provide significant biodiversity improvements on the main PS site.
- 1.2.36 A gross area of 130 hectares has been identified within the site boundary. In addition, this area would combine with the area of existing Caledonian pine and proposed Rhododendron eradication and native woodland regeneration, which has now been extended to the west since the original S36 application. This area now comprises 204 hectares, 115 hectares of which would lie within the boundary of WLA 18. This is shown in **Plate 9** and further detailed in **Section 1.3** below.
- 1.2.37 Further details will be developed, however at this stage a species mix reflective of existing Caledonian forest including Scots pine, rowan, birch aspen and alder is proposed on the lower slopes. Montane scrub including species such as willow, juniper, birch and rowan is proposed for areas within the upper corrie to promote biodiversity and would be appropriate to the WLA landscape character.
- 1.2.38 Planting would be considered sensitively to avoid increasing the appearance of a heavily managed landscape. Any mechanical works would be kept to a minimum and planting carried out by hand where possible. The design of planting areas would be considered sensitively, particularly the scrub, with denser and irregular clumps of planting interspersed with open areas intended to reflect natural growth patterns. The exclusion of deer from these areas by fencing would also encourage further regeneration of native scrub.

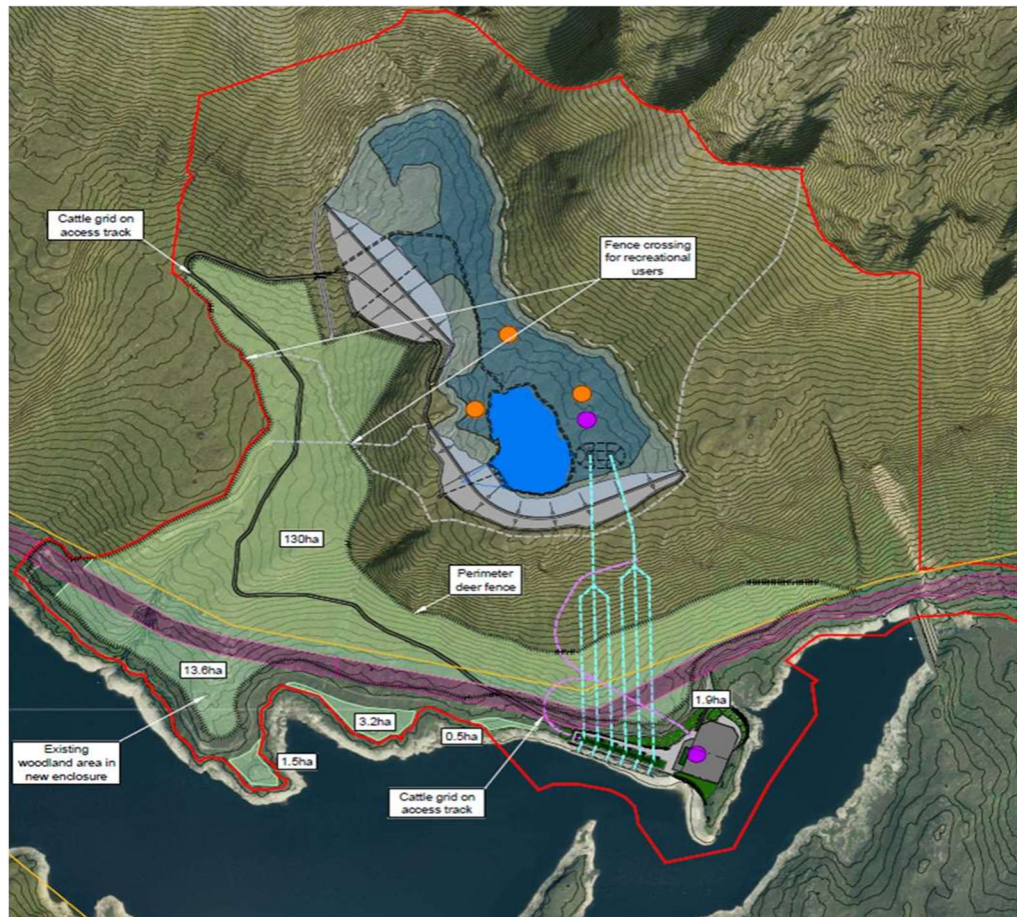


Plate 9 – Additional native woodland areas within site boundary

1.3 Additional Habitat Enhancement Proposals

- 1.3.1 This section presents details of significant increases to the habitat enhancement proposals, with an increased focus within Wild Land Area 18 and the site boundary, including further peatland restoration, native woodland restoration and planting, eradication of invasive non-native species, deer density reduction, and river sediment augmentation and other measures to support Atlantic salmon and other aquatic species.
- 1.3.2 NatureScot advised in its letter of 4 September 2025 that “*We have considered other interests, including the proposal's potential for biodiversity enhancement, and taken them into account in reaching our conclusion on this proposal*”. In response to this, a very substantially greater package of habitat enhancement measures is now proposed than that offered in the OBEMP in Appendix 8.7 to the S36 planning application EIA report. This package is outlined in **Table 4** below, which represents the “Revised OBEMP”.
- 1.3.3 A summary of the revised habitat enhancements, which are shown in **Figure 8.7.1 E2** is as follows:

Peatland Restoration

- 1.3.4 The revised OBEMP undertakes to restore 891ha of peatland, all of which is within the WLA, within the landholdings hosting the Proposed Development. The area of blanket bog affected by the Proposed Development is 63ha. 891ha represents mitigation for this at a ratio of 10:1 (630ha) plus a BNG habitat enhancement of 414% (261ha). The revised offer is an increase of 251ha (a 39% increase) of peatland restoration above that the 640ha offered in the OBEMP submitted with the S36 EIA report. Once complete and established that would have a significant beneficial effect on the landscape within the WLA.

Native Woodland Restoration and Planting

- 1.3.5 The revised OBEMP undertakes to restore or plant 460ha of native woodland, of which 255ha would be within WLA 18. That outside WLA 18 would still be providing a landscape benefit to receptors within the WLA. This is an increase of 260ha or 130% over the 200ha included in the OBEMP submitted with the S36 application EIAR. Where the restored areas include exotic species, these would be removed. The construction of the Proposed Development would lead to a loss of 7ha of native woodland and 19ha of non-native conifer plantation, a total of 26ha of woodland. The revised OBEMP thus offers to restore or plant 17.7 times as much woodland as is lost to the construction of the Proposed Development.

Deer Management

- 1.3.6 The revised OBEMP undertakes to reduce and manage the deer density within over 12,000ha of the FLS Glengarry Forest from 5/km² to 2/km². This is an additional measure to what was offered in the original OBEMP, which would have a very significant biodiversity enhancement benefit, the great majority of which is within WLA 18. In addition, deer densities would be reduced where necessary to deliver the habitat enhancements in the other landholdings.

Habitat Measures to Benefit Aquatic Species

- 1.3.7 The revised OBEMP undertakes to deliver support to the Upper Garry Salmon Restoration Project's smolt Trap and Truck programme, sediment Augmentation of the River Garry below the Invergarry dam (refer to Section 1.7 below) and installation of large wood structures in the River Kingie. There are no fish in Loch Fearn, and separate mitigations are proposed for the effects on fish in Loch Quoich (Arctic charr, trout and minnow, but no migratory salmonids). Although the Proposed Development will have a negligible effect on fish habitats and populations downstream of the Quoich Dam, the

proposed habitat enhancement measures would support fish and other aquatic species in the River Kingie, Gearr Garry and Loch and River Garry.

- 1.3.8 We would note that all landowner agreements are in place to allow the delivery all the habitat enhancement measures proposed, and that their implementation would be commenced immediately following FID for the scheme, should it be consented, and completed by the end of the construction period of the Proposed Development.
- 1.3.9 Further measures proposed to specifically benefit Common Scoter and Black-throated Diver have been separately presented and are covered in Section 1.4 below. It should be noted however that these compensation measures would also contribute to offsetting the landscape impact on WLA 18.

Table 4 - Revised Habitat Enhancement Measures

Ref		Commentary	Area (ha)	Area in WLA (ha)
A	PEATLAND RESTORATION			
	OBEMP PEATLAND RESTORATION	The revised OBEMP undertakes to restore 891ha of peatland within the landholdings listed at A1 to A-6 below, all of which is within the WLA. The area of blanket bog affected by the Proposed Development is 63ha. 891ha represents mitigation for this at a ratio of 10:1 (630ha) plus a BNG habitat enhancement of 414% (261ha). The revised offer is an increase of 251ha (a 39% increase) of peatland restoration above that the 640ha offered in the OBEMP submitted with the S36 EIAR. Once complete and established that would have a significant beneficial effect on the landscape within the WLA.	891	891
A-1	Peatland restoration – Forestry and Land Scotland (FLS) - Glengarry Forest	Restoration of areas within FLS Invergarry title - refer to plan at Figure 8.7.1 E2. Some of these areas are within FLS's "strategic fence" (see section C below which addresses deer control). The areas outside the strategic fence would be separately fenced to exclude deer, unless numbers are already low enough through deer control outside the strategic fence for the peat restoration to succeed without fencing. The areas presented have been assessed for restoration potential by ADL Nature. Fearn PSH have a commercial arrangement with FLS which includes the right to carry out any agreed biodiversity enhancements.	354	354
A-2	Peatland restoration - FLS - Clunes	Of the area surveyed by ADL Nature as suitable for peatland restoration of 153ha, 125ha is montane peatland. The area is within the FLS "strategic fence" so deer numbers would be suitable for peat restoration to succeed. Approximately half of this area is montane (over 600m AOD), which has a higher habitat value than sub-montane peat.	89	89
A-3	Peatland restoration - West Glenquoich Estate	All areas identified by ADL Nature as being suitable for peat restoration under the Peatland Cose that also lie within the WLA have been included. There is an agreement with the estate to take forward this restoration.	388	388
A-4	Peatland -East Glenquoich Estate	All areas identified by ADL Nature as being suitable for peat restoration under the Peatland Cose that also lie within the WLA have been included. There is an agreement with the estate to take forward this restoration.	33	33

Ref		Commentary	Area (ha)	Area in WLA (ha)
A-5	Peatland – SSE	Areas within the footprint to Loch Quoich above the normal high water level, but below the spill / flood level which is the extent of SSE ownership. These areas are particularly attractive to restore where they can take peat from the Fearna Reservoir footprint and use it beneficially in restoring heavily degraded areas around Loch Quoich. These areas have been surveyed and assessed by ADL Nature, including quantification of the amount of peat that can be used here from the Fearna reservoir site. This has been included in the Peat Management Plan. For this reason, this measure is a priority for inclusion in the final BEMP.	26	26
A-6	Dragonfly habitat improvements	As part of measures A-1 to A-5 above, include specific design for improvement of dragonfly habitat.	1	1
		TOTAL PEATLAND RESTORATION	891	891
B	WOODLAND			
	OBEMP WOODLAND RESTORATION AND PLANTING	The revised OBEMP undertakes to restore or plant 460ha of native woodland, of which 255ha would be within the WLA, as detailed at B-1 to B-7 below. The areas outside the WLA would still be providing a landscape benefit to receptors within the WLA. This is an increase of 260ha or 130% over the 200ha included in the OBEMP submitted with the S36 application EIAR. Where the restored areas include exotic species, these would be removed.	460	255
B-1	Removal of exotic timber within Caledonian Pine restoration areas in the Glengarry Forest	Restoration of areas within FLS Invergarry title. Removal of exotic timber will take place in conjunction with some of the proposed riparian planting within the Glengarry forest.		
B-2	Planting east of Pouлары (blue area on EIAR Figure 8.7.1)	Native woodland planting would be established east of Pouлары (9 ha) as to improve connectivity between native woodland sites and nearby riparian areas. This area is outwith the WLA.	9	0
B-3	Riparian restoration / planting along the Gearr Garry	There is currently no riparian woodland. Regeneration / planting would provide shading, lower water temperatures and deposit organic material and woody debris for the Gearr Garry. A fenced deer enclosure is proposed to allow natural regeneration combined with some planting with locally sourced native trees (from the Arkaig Community Forest Tree Nursery).	51	0
B-4	Riparian planting along the River Kingie	There is currently no native riparian woodland along the River Kingie. Planting of native trees would provide the river with shading, lower water temperatures and deposit organic material and woody debris. The riparian woodland would be within fenced deer enclosures.	25	25
B-5	Riparian Planting along River Garry and tributaries within the Glengarry Forest.	Riparian planting to south bank of the River Garry, the Allt Choire a Bhalachain and the Allt Fionn-dhail. This would be within fenced deer enclosures unless the deer numbers within the FLS strategic fence are sufficiently low to obviate the need for additional enclosures.	160	15

Ref		Commentary	Area (ha)	Area in WLA (ha)
B-7	Native woodland planting adjacent to Loch Quoich to south of Gleouraich and on the lower south face of Spidean Mialach.	Regeneration of the existing area of native woodland along the north side of Loch Quoich between the Allt Fearnna to west of the Allt Coire Peitireach, together with regeneration / planting of native woodland within Coire Mheil and to the north of the C1144 below Loch Fearnna. This would be within a fenced deer enclosure. This is also the area affected by rhododendron infestation, the eradication of which is covered in Section E below. Whilst some of this area (100ha) is just outside the boundary of the WLA, for the purposes of its landscape impact it is effectively within the WLA and would be of benefit to it. Furthermore, once established, it would help to screen the new Skye Transmission Upgrade pylons from sight from the road, which would be a further benefit to experience of the WLA by receptors using the C1144 public road.	215	215
		TOTAL WOODLAND RESTORATION	460	255
C	DEER CONTROL			
	DEER CONTROL	The revised OBEMP undertakes to reduce and manage the deer density within approximately 12,000ha of the FLS Glengarry Forest from 5/km² to 2/km², and to control deer numbers elsewhere if required to support peatland restoration works. This is an additional measure to what was offered in the original OBEMP.		
C-1	Deer control within FLS land ownership	The greater part of FLS's Glengarry Forest, approximately 12,000ha is currently nominally protected against deer ingress by their approximately 36km long "strategic fence", which is indicated in Figure 8.7.1 E2. This fence is currently reported by FLS to be "porous". FLS are planning to repair 21km of the fence over the next few years, leaving a further 15km requiring repair and 8km of "missing links" to be built from new, all in order to isolate the forest within the fence from deer ingress. In conjunction with delivering an intact deer enclosure, FLS plan to reduce deer numbers within the fence from the current 12 deer/km ² to a target figure of 5 deer/km ² by 2033. They have a deer management plan to support this and have shared this with The Applicant. FLS have invited the Applicant to contribute to reducing the deer density even lower than their planned 5 deer/km ² by carrying out the additional fencing repair (15km) and construction (8km) and carrying out the stalking effort that would be required. We believe that further reducing the deer density to 2/km ² would lead to very significant habitat enhancement over a large area, and we are keen to prioritise this measure. Where necessary to support peat restoration outside the strategic fence, these areas would be separately protected by fencing if current deer densities are too high for effective restoration.		
C-2	Deer control within other landownerships	It is understood that deer numbers in other landholdings where peat restoration is proposed are already sufficiently low to meet the requirements of the Peatland Code. Landowners have however agreed to further density reductions as required. Woodland restoration and planting in these landholdings would be within fenced enclosures.		

Ref		Commentary	Area (ha)	Area in WLA (ha)
D	FISH			
	HABITAT MEASURES WHICH WOULD BENEFIT AQUATIC SPECIES	The revised OBEMP undertakes to deliver all of the following habitat improvements. There are no fish in Loch Fearn, and separate mitigations are proposed for the effects on fish in Loch Quoich (Arctic charr, trout and minnow, but no migratory salmonids). Although the Proposed Development will have a negligible effect on fish habitats and populations downstream of the Quoich Dam, the following habitat enhancement measures to support fish and other aquatic species in the River Kingie, Gairr Garry and Loch and River Garry.		
D-1	Supporting the Upper Garry Salmon Restoration Project's smolt Trap and Truck programme.	The NDSFB already operate a programme of "trapping and trucking" smolts in the Upper Garry catchment. This employs the use of temporary screw traps in the River Kingie during the smolt run. The trapped smolts are then transported to Loch Oich, thereby avoiding issues which would otherwise compromise their survival including predation by pike in Loch Garry, mortality as they pass through the hydro turbines at Invergarry power station and issues with attraction to the outlet of Loch Garry due existing hydro infrastructure and management. The Applicant proposes to assist with this programme by supporting the NDSFB in improving the effectiveness of the trap and truck programme. This would be by commissioning suitably qualified experts to investigate the opportunity to improve the effectiveness of smolt trapping (currently only approx. 20% of migrating smolts are captured) with a more effective smolt trapping method. This could potentially be installed at the site of the proposed bridge over the River Kingie. If feasible, the Applicant would fund the design, construction and installation of the new smolt trapping facility. The Applicant would also support the trap and truck programme by provision of ongoing logistical support including the provision of a vehicle, equipment and labour resources, and with the ongoing monitoring of the project.		
D-2	Riparian planting	The proposed riparian planting identified in Section B above would offer significant ecological benefits by improving water quality, controlling erosion, and enhancing biodiversity. Riparian trees act as a natural buffer against pollutants, filter sediment and nutrients from runoff, and stabilize riverbanks. They also provide critical habitats for aquatic and terrestrial wildlife, moderate water temperatures through shading, and supply organic material to the river ecosystem.		

Ref		Commentary	Area (ha)	Area in WLA (ha)
D-3	Sediment Augmentation of the River Garry below the Invergarry dam	Provision of a programme of sediment augmentation to the River Garry below the Invergarry dam as outlined in the report which is an appendix to the SEPA CAR Licence Application Report. The ecological degradation of the River Garry is primarily the result of historic hydropower development, which has disrupted natural flow and sediment transport for over 70 years. The proposed Loch Fearn scheme presents an opportunity to offset its unavoidable impacts by restoring habitat quality in the lower River Garry, particularly salmonid spawning and fry habitats, which are currently limited. The core mitigation strategy is gravel and cobble augmentation to replace lost sediment supply downstream of the Garry Dam. Two complementary approaches are proposed: • Method A: large-scale gravel placement just downstream of the dam, to be redistributed by high flows, creating a longer-term sediment supply. • Method B: targeted local augmentation at hydraulically suitable sites to immediately improve spawning and fry habitat, potentially reinforced with Large Wood Structures (LWS) to enhance channel roughness, retain sediment, and diversify habitats. Preliminary surveys have identified feasible sites for both approaches, though final design will depend on detailed geomorphic assessment, hydrological analysis, and sediment transport modelling. Access for machinery is a practical constraint that will require early contractor input. In combination, sediment augmentation and LWS implementation offer the potential to significantly enhance salmonid productivity, restore channel diversity, and deliver wider biodiversity benefits. The proposed works would provide meaningful ecological mitigation for the Proposed Development while addressing long-standing hydropower-related impacts on the River Garry.		
D-4	Large wood structures in the River Kingie	To support the recovery of the Garry catchment Atlantic salmon population, as well as to improve habitats and invertebrate food sources for Common Scoter, it is proposed to install large wood structures in the River Kingie. Large wood structures create diverse habitats, including deep pools for fish refuge, and complexity in the riverbed through the trapping of gravel and sediment. It creates channel roughness, which slows water flows during floods and can help reduce erosion. The decay of large wood structures supports microbial communities and helps cycle carbon and nitrogen, improving water quality. It provides cover from predators, creates new niches for invertebrates, and helps restore natural processes like channel repair and re-meandering.		
E	ERADICATION OF INNS			
E-1	Removal of invasive non-native Rhododendron to north shore of Loch Quoich and in Coire Peitireach and Coire Dubh.	Eradication of an extensive area of rhododendron (approximately 100ha in extent) to the west of Fearn PSH site which has spread from the shore of Loch Quoich up to an elevation of over 500m. The invasive rhododendron is prolific within the ancient woodland area, the regeneration of which it is currently stifling.	100	100

Ref		Commentary	Area (ha)	Area in WLA (ha)
E-2	Removal of exotic timber within Caledonian Pine restoration areas in the Glengarry Forest	Restoration of areas within FLS Invergarry title. Removal of exotic timber will take place in conjunction with some of the proposed riparian planting within the Glengarry forest.		
E-3	Control of invasive non-native species - wild boar / feral pig control, mink control, other.	The Applicant is prepared to deliver control of invasive non-native animal species if this is deemed to be beneficial to Common Scoter or any other species or habitats.		

1.4 Additional Habitat Enhancement for Common Scoter and Black-throated Divers

- 1.4.1 Details of additional habitat enhancement measures to support Common Scoter and Black-throated Diver within the West Inverness-shire Lochs SPA are given in **Table 5** below.
- 1.4.2 This table should be read in conjunction with **Figure 8.7.1 E2** - Habitat Enhancement Plan. These habitat enhancement measures for effects on the West Inverness-shire Lochs SPA are separate from and in addition to the proposed habitat enhancements detailed at Section 1.3 above. However, many of these habitat enhancement measures would directly enhance habitats for Common Scoter and Black Throated Diver, indeed many of them - peatland restoration, riparian planting and other habitat enhancements are included in the RSPB led West Inverness-shire Lochs Habitats and Species Restoration Plan.

Table 5 - Additional Habitat Enhancement for Common Scoter and Black-throated Divers

Ref	Description of Measure	Commentary
1	Habitat development around Loch an Staic	Loch an Staic has a pair of breeding red-throated divers on a raft managed by FLS. The habitat is also used by nesting greenshank and wood sandpiper. The loch appears to have potential as a site for common scoter, and FLS have suggested that scoters may have been observed here. It is proposed to create a 16ha deer enclosure (this could be enhanced to exclude predators of scoters and other ground nesting birds). Within the enclosure the habitat would be managed, including regeneration and planting of suitable native trees and other vegetation to optimise its suitability for the bird species already present or potentially using the loch. This work could be initiated early so that by the start of the main PSH construction the habitat is well established.
2	Habitat improvement for scoter - nesting islands restoration in Lochs Loyne and Garry	Since the submission of the Section 36 planning application for Fearn, the RSPB were kind enough to forward reports by "The Aquatic Consultancy" on the restoration and enhancement of common scoter habitat within both Loch Loyne and Loch Garry. The Applicant is prepared to support and fund all of the measures put forward in these two reports, with the exception of the dam across the western end of Loch Loyne, which we do not consider the dam option to be reasonably practicable, sensibly affordable, and may not be acceptable to its owner. The budget costs for these works, based on the "scaled back" version (excluding the dam) are in the region of £1.1M. We would be prepared to offer this money through an agreed funding structure to support the delivery of these works, subject to consents and landowner agreement. Should the Inverness-shire Lochs Habitat Restoration Project have secured the funding for these works from elsewhere, we would be happy to transfer the funding to other local works to support the wider aims of the project. We would be happy to develop the works proposals with stakeholders in advance the start of construction of the scheme, following FID for the project.

Ref	Description of Measure	Commentary
3	Habitat improvement for scoter - installation of floating ecosystems specifically designed to provide nesting and feeding habitat for Common Scoter	As a development of floating ecosystems that we will be installing at our Earba PSH project, we believe that this concept can be adapted to create floating ecosystems, along the lines of a design concept by Biomatrix Water, a company based in Forres: https://www.biomatrixwater.com/. Their proposal for Earba was for a series of floating ecosystems approximately 200m² each which would float on tethers in the loch, rising and falling with the water level in the reservoir. The Earba ecosystems are designed to have fish spawning beds suspended beneath the floating island, which would also provide a habitat for invertebrates and fish, as well as potentially a nesting opportunity for divers. We believe that this concept could be developed to focus on the habitat requirements for scoter in the West Inverness-shire Lochs SPA, that is a suitable nesting environment protected from predators and a source of food. Furthermore, much of the construction could be done off-site and the habitats then put together at a suitable access point before being towed to their installation location and anchored. This reduces the disturbance in the nesting areas and gets rid of many of the construction logistical problems associated with the in-situ habitat improvements as detailed by Aquatic Consultants in their reports. We also believe that these planted designed ecosystems will become established more quickly than restoration of in-situ islands, and that there's more opportunity to get them functioning effectively in advance of any impact at Fearna. As well as Biomatrix's track record of designing and installing this type of system, there is a precedent for this from other projects that have used this concept in Sweden (https://group.vattenfall.com/press-and-media/newsroom/2025/vattenfall-launches-floating-islands) and Madagascar (https://www.wwf.org.uk/our-work/projects/saving-the-madagascar-pochard) as well as potentially others that we are not currently aware of. Floating ecosystems could be installed in Lochs Loyne and Garry as appropriate. Our initial suggestion, subject to development by interested stakeholders, would be to install a prototype at an early stage, potentially to tie in with the release of some of the ducklings from the NRF HATCH project, should this proceed. If the prototype is successful, further units could be installed. Fearna PSH is prepared to commit up to the full costs of developing, installing and maintaining these floating ecosystems.
4	Support scoter headstarting programme	Head-starting is a technique that involves the captive rearing of some of the eggs that might otherwise be predated or flooded, rearing the ducklings and releasing the fully grown young onto the lochs once they are passed the most vulnerable stage. SSE Renewables are leading the "HATCH" Common Scoter Headstarting project, which is currently preparing a bid to the NRF for funding to deliver headstarting in 2026/27. SSER have invited Fearna PSH Ltd to be a part of the HATCH team. This will involve financial and in-kind support to the project, as well as the opportunity to contribute to the coordinated planning and delivery of the habitat improvements detailed at items 1 to 3 above.
5	Habitat improvement black throated diver - provision of floating nest islands	Provision of additional floating nest islands in Loch Loyne, Loch Poulary, Loch Garry, other lochs that are or could be made suitable. Siting and design would be developed in conjunction with the RSPB.
6	Fund to support future Monitoring and Research and Development of SPA compensatory and wider biodiversity enhancements	We see the ongoing monitoring of the proposals described in this document and those set out in the Habitat and Biodiversity Enhancement Plan as being a key aspect of their long-term success, delivering continuous improvement. Additionally, further research, the scope of which would be informed by monitoring results, would provide valuable information which may guide the future direction of enhancement measures. We also recognise the current challenges associated with securing funding resource to implement measures to provide biodiversity enhancements and the relatively short-term nature of the support on specific issues. Fearna PSH commits to providing a dedicated fund which would support the monitoring, R&D and delivery of enhancement measures within the SPA and wider Glen Garry area. We envisage that this fund would operate on an application-type basis, perhaps similar to the NRF structure and including key stakeholders in its administration and management.

Ref	Description of Measure	Commentary
		The Fearn PSB board commits to a level of funding appropriate to deliver the required landscape-scale enhancements throughout the lifespan of the project.

1.5 Water Temperature Survey and Modelling

- 1.5.1 A number of surveys and studies have been carried out to investigate the existing temperature regime of Loch Quoich and the Gearr Garry and other waterbodies downstream, as well as the potential effects on these temperatures from the operation of the controlled activities. These are attached as follows:

- **Appendix A - Baseline Survey of Temperatures in Loch Quoich and the Gearr Garry, Gavia Environmental Consultancy, February 2025**
- **Appendix B - Calculation of Temperature Effect per Cycle, Mott Macdonald, May 2025**
- **Appendix C - Tuflow FV 3D Modelling Report – Assessment of Temperature Variance in Loch Quoich, SLR Consulting, August 2025**

- 1.5.2 The results of these surveys and assessments are detailed below.

Baseline Survey of Temperatures in Loch Quoich and the Gearr Garry

- 1.5.3 A detailed water temperature monitoring investigation was undertaken within Loch Quoich and the Gearr Garry between August 2024 and July 2025. This includes updating of the data provided with the EIA Report of 28 February 2025, which only included data up to February 2025.
- 1.5.4 A total of 11 No. temperature sensors were deployed across five discrete locations throughout the investigation area. The investigation was designed to provide insight into the water temperature regime in Loch Quoich and in the Gearr Garry. Additional river temperature data for the Gearr Garry, River Kingie and East Poulary was provided by the Ness District Salmon Fishery Board (NDSFB) and has been used in the investigation.
- 1.5.5 The monitoring indicates that the water temperature regime in Loch Quoich appears to conform to a warm monomictic lake regime, whereby the lake stratifies into a warm buoyant shallow layer overlying a stable dense colder layer during summer and autumn. This stratification, and the corresponding thermocline collapse, leads to a well-mixed water column which persists and gradually cools during the winter and spring. A single annual mixing event was observed to occur progressively and episodically over a four-week period between late October and mid-November 2024. While not directly observed, the corresponding annual re-stratification is expected to occur between April and June.
- 1.5.6 Notable diurnal temperature variation is evident in the uppermost surface waters; this variation is strongest in summer becoming more subdued in winter. The overall water temperature regime is observed to range between approximately 4.5 °C and 19 °C. The deeper hypolimnion layer, when present, is observed to be very stable with respect to water temperature, at approximately 7 °C. Prevailing ambient air temperature, coupled with seasonal and meteorological factors are believed to be the dominant driving mechanisms of the water temperature regime observed. A significant secondary driving mechanism is the warm monomictic lake regime which occurs due to the Loch's significant size and depth.
- 1.5.7 Water temperatures are significantly more variable within the Gearr Garry than in Loch Quoich. Significant diurnal variation was observed at all monitoring locations, with the largest temperature variation range observed in the spring/summer/autumn months, and relatively modest temperature variation observed during the winter months. Prevailing ambient air temperature, coupled with seasonal and meteorological factors have been identified as the dominant driving mechanisms of the water temperature regime observed.
- 1.5.8 The investigation included monitoring location 5, which is 200m downstream of the outflow of the existing Quoich hydro scheme, which is conveyed approximately 4km by

means of an underground concrete-lined tunnel before being used to drive a turbine-generator at Quoich Power Station. This location is downstream of the confluence of the Gearr Garry and River Kingie and is thus affected by three incoming flows: the River Kingie, the Gearr Garry and the turbine discharges, as well as by the ambient temperature.

- 1.5.9 When the Quoich hydro station is not generating, the temperature closely matches that of the River Kingie, which is in turn very strongly influenced by the ambient temperature. There is little moderating effect from the Gearr Garry flows, unless during very dry natural flows in which case it has a small but noticeable moderating effect. There is however a significant moderating effect on water temperature when the Quoich hydro station is generating, with the 18m³ flow being sufficient to generate temperatures 6oc warmer in winter and 8oc cooler in spring than the River Kingie flow based on the overlapping period of data currently available.

Calculation of Temperature Effect per Cycle

- 1.5.10 A calculation of the temperature effect per full cycle (pumping followed by generating) of the PSH has been carried out by hydro specialists at Mott Macdonald. This calculates the energy input for pumping and the energy output from turbines, which determines the heat generated due to inefficiencies, including from friction losses in the tunnel system. The calculation is conservative in that it assumes that all of this heat is transferred to the water passing through the pump turbines, whereas in fact some would be transferred to the air, and some losses would be manifest in other energy forms than heat. A further 3% factor of safety has been applied to the efficiency in the temperature increase calculation (90% efficiency assumed instead of 93% calculated).
- 1.5.11 The subsequent step in the calculation derives the temperature increase per cycle due to the heat generated. The value calculated is 0.063oC per full pumping / generating cycle of the PSH. This value has been used in the temperature variance study for Loch Quoich.

Assessment of Temperature Variance in Loch Quoich

- 1.5.12 A 3D hydrodynamic modelling study was carried out by SLR Consulting using the software TUFLOW FV to assess the potential thermal impacts of the proposed Fearna PSH on Loch Quoich. This study responds to comments by stakeholders including the Ness District Salmon Fishery Board (NDSFB) regarding potential alterations to natural thermal stratification and downstream temperature regimes, which are critical for sensitive aquatic species such as Atlantic salmon and Arctic charr.
- 1.5.13 The modelling assessed baseline thermal conditions and the influence of PSH operations under various discharge temperature scenarios. Simulations were conducted for short-term (1 month, September 2024), medium-term (12 month, January to December 2022) and longer term (4 years, January 2020 to December 2023) periods. The model used the input value of 0.063oC/full cycle derived in the Mott Macdonald study, as well as a values higher and lower than this as a sensitivity analysis using 0.5% and 1% increases in temperature per cycle. A forecast long term operational flow regime for the PSH produced by the specialist power market analyst LCP Delta, which supports the economic case for the project, was used in the modelling work. This flow data represents the best available forecast of how the PSH would operate during its operational life.
- 1.5.14 Model validation against observed data from the baseline temperature survey carried out between 2024 and 2025 showed good agreement, particularly in bottom layers, confirming the model's reliability. Some discrepancies in short-term variability are attributed to the model's vertical resolution, which can smooth diurnal fluctuations.
- 1.5.15 The modelling results confirm that Loch Quoich is a thermally stratified system during summer months, with a stable thermocline that isolates cooler bottom waters from warmer surface layers. This stratification is ecologically important, supporting cold-water habitats and influencing downstream thermal regimes.

- 1.5.16 The introduction of PSH operations, particularly with surface-level inflows located near the dam wall, has the potential to alter this natural stratification. Although the discharge enters at the surface, the volume and proximity of the inflow to the dam outtake appear to influence the thermal structure at depth. This is likely due to localised mixing effects from the PSH inflow, which allow warmer surface water to affect the temperature of water extracted at the dam base. While the PSH may cause minor warming within Loch Quoich, the thermocline is still intact within the system during warmer periods.
- 1.5.17 The monthly average temperature increases at the dam outtake over the 12-month simulation period show a seasonal pattern, with lowest impacts during winter months (January-March and November-December) and peak increases during summer (July-September). The 0.063°C increase scenario consistently results in the average temperature increases, reaching up to 0.40°C at the surface and 0.57°C at the bottom in September and August respectively.
- 1.5.18 The modelling has shown that even modest increases in discharge temperature (e.g. 0.063°C) can result in detectable warming at the dam outtakes (that is compensation flow release through the Quoich dam and the discharge via the tunnel through the Quoich power station to the watercourse downstream of Loch Quoich). Higher temperature scenarios (1% increase) lead to more pronounced thermal impacts, including elevated bottom temperatures and increased vertical mixing.
- 1.5.19 The modelling study concluded that Loch Quoich exhibits strong seasonal thermal stratification under natural conditions, with a well-defined thermocline forming during warmer months. The introduction of the Fearna Pump Storage Hydro (PSH) scheme, particularly with surface-level inflows located close to the dam wall, has the potential to alter this thermal structure.
- 1.5.20 The 4-year simulation provides a robust framework for assessing the cumulative thermal effects of sustained PSH operations at Loch Quoich. By applying a repeated annual pump/generation schedule and simplifying outputs to daily temperature values, the model captures long-term trends while managing computational constraints. Analysis at the loch outlet, where flows enter the Gear Garry, reveals only a marginal increase in temperature under the PSH scenario, suggesting that operational flows do not significantly disrupt the thermal regime and are unlikely to significantly alter long-term thermal conditions in the loch.

Conclusions from Water Temperature Assessments

- 1.5.21 The temperature monitoring investigation carried out between August 2024 and July 2025, supplemented by data recovered over recent years by the NDSFB in the Gearr Garry, River Kingie and East Poulary, has provided a good baseline for understanding the temperature effects which prevail within Loch Quoich and the Gearr Garry.
- 1.5.22 The results have additionally shed light on the already existing influence of the operation of the Quoich reservoir and hydro scheme on the water temperature regime of the Gearr Garry.
- 1.5.23 The water temperature regime of Loch Quoich has been modelled using the software package TufLOW FV 3D, both the existing baseline and with simulation of the predicted flows and calculated temperature increases that associated with the operation of the controlled activities (PSH). This has been modelled over one month, one year and 4-year periods.
- 1.5.24 The modelling study found that Loch Quoich naturally develops strong summer stratification, which remains largely intact under operation of the proposed Fearna PSH scheme. PSH operations may cause slight seasonal warming at the dam outtake (up to ~1°C in summer), but long-term effects are minor, with no significant disruption to the loch's thermal regime or downstream conditions.

1.6 Geomorphological Assessments

- 1.6.1 A geomorphology survey and assessment has been undertaken, which includes a number of key recommendations that have been incorporated into the design and drawings.
- 1.6.2 The assessment covers both the main PSH site and the SAR and is attached in the following documents:
- **Appendix D – Geomorphology Report – Southern Access Route (SAR);** and
 - **Appendix E - Geomorphology Report– PSH Area.**

Southern Access Route

- 1.6.3 The reporting is based on a visual assessment of the current flow capacity of culverts/ bridges along the SAR; more detailed numerical calculations of flow conveyance and sediment transport could be undertaken, as necessary. Importantly, consideration of the potential reduction in the capacity of culverts/ bridge apertures due to sediment accumulation (possibly increasing in the future due to climate change and land-use management, e.g. forestry) was included in the assessment. Based on this assessment, five stream crossings are identified where it is advised that the current culvert requires to be upgraded (ideally changed to a box culvert or a single span bridge, to minimise impact to fluvial/ sediment transport processes and to allow a natural substrate bed through the structure).
- 1.6.4 There are 15 other crossings where, given that the SAR is to be upgraded in places, that improvements to culverts and bridges should be considered. There are also 5 current crossings that are likely compromised by imposed flow and sediment transport regime and modification to the structure is advised, identified on the basis of their apparently high sediment transport regime. The significant sediment supply in these streams probably relates to local geology (e.g. overlying glacial/ fluvio-glacial sediment deposits) and possibly land management activities (e.g. forestry practice) in this region of the wider Garry catchment; culvert re-design needs to account for these factors.

PSH Area

- 1.6.5 The proposed Loch Fearna pumped storage scheme will expand the existing reservoir from ~10 ha to ~95 ha, raising the maximum water level by ~60 m. This expansion will intercept several small streams, most of which are stable, supply-limited systems with minimal evidence of recent erosion or instability. While localised peat erosion and one small landslide were observed, the overall stream network is not expected to undergo significant adjustment as a result of reservoir expansion.
- 1.6.6 The principal risk relates to slope instability around the reservoir margins, particularly in the 590–600 m elevation band where fluctuating water levels will interact with soils, peat, and vegetation. Loss of stabilising vegetation and repeated exposure of saturated ground may trigger erosion and landslides. To mitigate these risks, engineered shoreline protection is recommended, including a graded rock apron supported by coir-based materials and native planting, with protection prioritised on the steepest slopes.
- 1.6.7 Downstream, both the Allt Fearna and Allt a Mheil are supply-limited channels and are unlikely to experience significant morphological change due to sediment disruption from dam construction. Nonetheless, a sediment management plan should be developed to account for minor contributions from the upper catchments.
- 1.6.8 Overall, the streams are stable, and impacts from reservoir expansion are expected to be minimal. The greatest concern is landslide risk, which can be effectively managed through targeted slope stabilisation and shoreline protection measures.

1.7 River Garry Sediment Augmentation Study

- 1.7.1 A geomorphology survey and assessment have been undertaken, including the River Garry below the Invergarry Dam, for the purposes of assessing the potential for sediment augmentation to be provided as a habitat enhancement for the benefit of Atlantic salmon and other aquatic species. This is attached as **Appendix F –River Garry Sediment Augmentation Appraisal**.
- 1.7.2 The ecological degradation of the River Garry is primarily the result of historic hydropower development, which has disrupted natural flow and sediment transport for over 70 years. The proposed Loch Fearn scheme presents an opportunity to offset its unavoidable impacts by restoring habitat quality in the lower River Garry, particularly salmonid spawning and fry habitats, which are currently limited.
- 1.7.3 The core mitigation strategy is gravel and cobble augmentation to replace lost sediment supply downstream of the Garry Dam. Two complementary approaches are proposed:
- Method A: large-scale gravel placement just downstream of the dam, to be redistributed by high flows, creating a longer-term sediment supply.
 - Method B: targeted local augmentation at hydraulically suitable sites to immediately improve spawning and fry habitat, potentially reinforced with Large Wood Structures (LWS) to enhance channel roughness, retain sediment, and diversify habitats.
- 1.7.4 Preliminary surveys have identified feasible sites for both approaches, though final design will depend on detailed geomorphic assessment, hydrological analysis, and sediment transport modelling. Access for machinery is a practical constraint that will require early contractor input.
- 1.7.5 In combination, sediment augmentation and LWS implementation offer the potential to significantly enhance salmonid productivity, restore channel diversity, and deliver wider biodiversity benefits. The proposed works would provide meaningful ecological mitigation for the Loch Fearn development while addressing long-standing hydropower-related impacts on the River Garry.
- 1.7.6 The above proposals have been added to the package of habitat enhancement measures included in the delivery of the Proposed Development

1.8 Temporary Construction Drawdown

- 1.8.1 A technical note dated June 2025 was prepared to present the modelling of the temporary drawdown of Loch Quoich during construction of the Proposed Development, and to describe the operational and construction interface between the proposed Fearna PSH scheme and the existing operational reservoir Loch Quoich. This note is attached at **Appendix G – Quoich Temporary Works Proposal**.
- 1.8.2 Analysis of the potential temporary drawdown of Loch Quoich during the summer months whilst also achieving compliance with the various environmental and operational constraints is challenging and cannot be guaranteed. The Fearna lower control works design has therefore instead adopted a temporary cofferdam solution, which provides robust isolation between Loch Quoich and the lower control works. The lower control works have been moved further up the shoreline to use the natural topography and rock conditions to minimise the temporary works requirements.
- 1.8.3 Whilst this is a robust solution, there is scope to further optimise the design and potentially minimise the required temporary works in later stages in the project.

1.9 Loch Fearna Common Scoter Habitat Suitability

- 1.9.1 The following advice note was in October 2025 prepared by Mike Coleman, the project's ornithology specialist on the suitability of habitats at Loch Fearna for Common Scoter:

Note on Common Scoter Habitat Suitability at Loch Fearna

- 1.9.2 Very few studies have concentrated on Common Scoter – a widespread and common breeding duck across most of its range, but a species that has suffered a 44% decline in its UK breeding numbers over the past 25 years.
- 1.9.3 Hughes et al.¹ states that the Flow Country population (approximately half the national population) remained stable between 2015 and 2022 despite a continued decline across the UK. The factors are different with the presence of plantation forestry leading to predation and trout populations taking the preferred scoter prey items amongst the main issues in Caithness, but nesting habitat is not a concern, and the population elsewhere in the UK continues to fall.
- 1.9.4 Forrester et al. in *The Birds of Scotland* (2012) stated that scoter nests can be 100m from the nearest loch and may be in tiny pool systems in blanket bogs some distance from large waterbodies. Islands are preferred in the lochs of the Western Highlands. The nest is buried under heather or in bracken, bramble and grasses. This opinion is mirrored in Ireland, where Birdwatch Ireland² state that the birds nest on islands with dense covering of scrub and tree cover.
- 1.9.5 The RSPB Species Restoration Project literature for Common Scoter in the West Inverness-shire Lochs mentions the importance of island restoration to stabilise important refuges for nesting species, re-establishing a carpet of heather, willow scrub and juniper suitable for nest seclusion.
- 1.9.6 The open nature of Fearna, with no discernible vegetation that is high enough to provide any cover does not seclude any potential nest sites, and predation remains a likely outcome for any ground-nesting species. Predation (albeit by Mink and not Otter or Fox) has led to the population decline in Ireland and is a serious threat in West Inverness-shire.
- 1.9.7 One reason for the poor vegetation is the altitude of Fearna – approximately 550m above sea level. Other known scoter waterbodies in Scotland are far lower, giving a more diverse ground cover with greater depth of cover as the slightly higher temperatures allow. Loch Loyne is approximately 200m ASL, Lundie is c. 150m ASL, both similar to the Flow Country which also varies between 150 and 200m ASL. The nearest altitude to Fearna is Con in Perthshire (c.400m ASL), where the population appears to have been lost in recent times, and the even higher Glendoe Lochans (c. 750m ASL) where birds only appear sporadically (Pers. Comm.) possibly depending on displacement from elsewhere like the Fearna birds. Although there is suitable bog pool habitat over a wider area at Glendoe, despite the lack of dense shrub and tree cover, it is suspected that predation is also an issue, although there is a lack of recent records suggesting that population may also have been lost.

¹ Hughes, R., Klein, D., Andersen, R., Anderson, R., Gullett, P. R., Littlewood, N., ... Hancock, M. H. (2024). Breeding Common Scoters *Melanitta nigra* in Scotland's Flow Country: a population in decline despite productivity being stable. *Bird Study*, 71(3), 256–269. <https://doi.org/10.1080/00063657.2024.2384950>

² <https://birdwatchireland.ie/birds/common-scooter/#:~:text=Small%20breeding%20populations%20in%20West,%2C%20supporting%20800%2D4%2C500%20birds.>

- 1.9.8 Finally, the topography of Loch Fearna is also unsuitable for Common Scoter, sitting in a rocky bowl with steep-sided banks, and very few shallow edges, with no vegetation within the water. This leaves birds exposed and forced to stay in the centre of the waterbody. This is in sharp contrast to nest site locations in the Flow Country, Glendoe, Loyne and locations in Scandinavia where I have worked that are all relatively flat with boggy pools and vegetated channels, offering levels of seclusion for both nests and for chicks once fledged. The photographs below show the open nature of Loch Fearna, the lack of any tall vegetation surrounding the water or nearby, the lack of vegetation within the fringes of the water, and the lack of any islands.



Plate 1 – Loch Fearna looking NE from the outflow



Plate 2 – Loch Fearna looking from the NW

1.10 Temperature Rise Effects on Aquatic Invertebrates

- 1.10.1 An advice note has been prepared on temperature rise effects on invertebrates in the Garry Garry and Loch Garry by Envirocentre. This is attached at **Appendix H - Advice Note on Temperature Rise Effects on Invertebrates in the Garry Garry and Loch Garry**.
- 1.10.2 The advice note concludes that potential for negative effects on common scoter and black-throated diver in Loch Garry, resulting from a decline in macroinvertebrate populations are unlikely to be of a high magnitude, as existing research suggests that significant effects on invertebrate populations would be unlikely under the current modelled temperature changes. Any negative impacts on macroinvertebrates, creating an indirect negative effect on common scoter and black-throated diver in Loch Garry, are likely to remain localised and seasonal; however, some uncertainty remains regarding cumulative impacts over longer timescales.

1.11 Response to RSPB Objection

- 1.11.1 A response to the RSPB's 6 June 2025 objection to the Proposed Development dated 24 June 2025 is attached at **Appendix I – Response to RSPB Objection** and **Appendix J – Response to RSPB Objection Confidential Appendix**. In these documents, the RSPB's objection text is in black text and the Applicant's response is in blue text.
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1.12 Summary and Conclusion

- 1.12.1 Post submission consultation and formal responses from the following consultees have led to the provision of the Additional Information in this document: The Highland Council (TCH), NatureScot, the Ness District Salmon Fishery Board (NDSFB) and the RSPB.
- 1.12.2 Other consultation responses have been received which are not referred to in this Additional Information as they do not raise any issues which require Additional Information to be provided.
- 1.12.3 Additional Information has been submitted covering the following subjects:

Subject	Additional Information Provided and the Associated Consequences
Changes to the Proposed Development	Various changes to the Proposed Development have been to reduce the visual impact of the Fearna Reservoir, in particular within WLA 18, to reduce ecological impacts, to reduce traffic impacts, to increase the habitat enhancements provided, and to reflect other minor changes to the design of the underground works following ongoing design development. These changes to the Proposed Development would significantly reduce its environmental impacts compared with the Proposed Development as presented in the 28 February 2025 EIA Report.
Additional Habitat Enhancement Proposals	Very significant increases to the habitat enhancement proposals have been added to the Proposed Development, with an increased focus within Wild Land Area 18 and the site boundary, including further peatland restoration, native woodland restoration and planting, eradication of invasive non-native species, deer density reduction, and river sediment augmentation and other measures to support Atlantic salmon and other aquatic species. It is contended by the Applicant that these habitat enhancement measures should be sufficient to offset the landscape and visual effects of the Proposed Development.
Additional Habitat Enhancement for Common Scoter and Black-throated Diver	Significant increases to habitat enhancement proposals that would directly benefit Common Scoter and Black-throated Divers, as well as other ornithological interests have at NatureScot's request been separately identified. It is contended by the Applicant that these additional specific habitat enhancement measures should be sufficient to offset any effects on Common Scoter and Black-throated Diver which are predicted to occur as a consequence of the construction and operation of the Fearna Reservoir.
Water Temperature Modelling	The 2024–2025 temperature monitoring, supported by recent NDSFB data, provides a strong baseline for understanding temperature patterns in Loch Quoich and the Gearr Garry, and highlights the existing influence of the Quoich reservoir and hydro scheme on downstream temperatures. Modelling using Tuflow FV 3D—run over monthly, annual, and four-year periods—shows that Loch Quoich naturally forms strong summer stratification that would remain largely unchanged under the proposed Fearna PSH scheme. While PSH

	operations may slightly warm outflow water in summer (by up to about 1°C), overall long-term impacts on the loch's thermal regime and downstream conditions are predicted to be minimal.
Geomorphological Assessments	Geomorphological assessments have been carried out for the SAR and PSH areas. At the SAR, this has identified some road culverts that need to be improved. At the Fearna Reservoir, stream impacts from reservoir expansion are expected to be small, with landslide risk being the primary concern and manageable through appropriate stabilisation measures.
River Garry Sediment Augmentation Study	In combination, sediment augmentation and installation of Large Woody Structures in the Lower River Garry offer the potential to significantly enhance salmonid productivity, restore channel diversity, and deliver wider biodiversity benefits. The proposed works would provide meaningful ecological mitigation for the Loch Fearna development while addressing long-standing hydropower-related impacts on the River Garry.
Temporary Construction Drawdown of Loch Quoich	The temporary drawdown of Loch Quoich during construction of the Fearna PSH scheme has been modelled. Due to challenges in meeting environmental and operational constraints, a temporary cofferdam has been chosen to isolate Loch Quoich from the lower control works, instead of drawing down the loch. Therefore, there will be no impact on the existing water management regime downstream of the Quoich dam, thereby avoiding any consequential environmental impact.
Loch Fearna Common Scoter Habitat Suitability	An advice note prepared by Mike Coleman Ecology has concluded that Loch Fearna's open, high-altitude environment (~550m) lacks the tall vegetation needed for cover, making ground-nesting birds vulnerable to predation. Compared to lower-altitude scoter habitats in Scotland with more diverse, protective vegetation, Fearna's rocky, steep-sided topography offers little shelter, forcing birds to stay exposed in open water. This contrasts sharply with more sheltered, vegetated nesting sites found at lower altitudes and other regions, contributing to the area's unsuitability for common scoter breeding.
Temperature Rise Effects on Aquatic Invertebrates	An advice note prepared by Envirocentre finds that significant negative effects on common scoter and black-throated diver in Loch Garry, via declines in macroinvertebrates due to temperature changes, are unlikely. Any indirect impacts on these birds would probably be small, localised, and seasonal, though some uncertainty persists about possible long-term cumulative effects.
Response to the RSPB's Objection	A response has been provided to the RSPB's objection, which the Applicant contends, given the other measures outlined above, should be capable of being withdrawn.

- 1.12.4 The Additional Information contained within this report supplements the original EIA Report by providing further design and other improvements to the Proposed Development which significantly reduce the environmental impacts further, but do not materially change the overall conclusions presented in the EIA report.