March 2025

Glen Earrach Pumped Storage Hydro

Environmental Impact Assessment Report

Volume 5: Appendices
Appendix 4.2: Consultation Tracker

Glen Earrach Energy Ltd

Glen Earrach AECOM

Quality information

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Issue History

Issue	Issue date	Details	Authorized	Name	Position
1	March 2025	Submission	DL	David Lee	Technical Director – Renewable Energy

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1. Introduction

1.1.1 This appendix has been produced to support **Chapter 4: Approach to Environmental Impact Assessment (Volume 2: EIA Main Report). Table 4.1** contains the consultation feedback received on the Proposed Development since the submission of the Scoping Report **(Appendix 4.1 Glen Earrach Scoping Report) (Volume 5: Appendices).**

1.1.2 Please note that comments and communications have been edited for brevity and clarity.

Table 4.1. Consultation Tracker

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
1	Energy Consents Unit	17th December 2024	Scoping	This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to AECOM on behalf of Glen Earrach Energy Limited a company incorporated under the Companies Act. The request was accompanied by a scoping report. **Details can be found in Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The proposed development is solely within the planning authority of The Highland Council. The location, storage capacity details, and principal components of the Proposed Development and ancillary infrastructure can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The proposed development has an operational lifetime of around 80 years, it is expected that the civil works (tunnels and embankments) will last for up to 100 years. The Company indicates that at the end of its operational life, the development would either be refurbished, or decommissioned. Following the scoping opinion request, AECOM (acting as the Company's agent) agreed on a list of consultees with the Energy Consents Unit. From 15 May to 6 June 2024, the Scottish Ministers conducted a consultation on the scoping report to obtain scoping advice on environmental matters, also seeking input from Transport Scotland. All responses are included in Annex B in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors. Numerous organisations were consulted but did not provide a response. The full list can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** For consultees who did not respond, it is assumed they have no comments on the scoping report. However, they will be consulted again if a Section 36 consent application follows this EIA scoping opinion. The Scottish Ministers are satisfied that the scope of the EIA and requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met. This scoping opinion was adopted following consultation with statutory bodies including The Highland Council, NatureScot, SEPA, and Historic Environment Scotland, along with other relevant organisations. Scottish Ministers considered the applicant's request from 26 April 2024, the proposed development's characteristics, and consultation responses. The opinion reflects current knowledge, assessment methods, and potential environmental impacts. The Company should note and address each of the following matters: - Scottish Water advised on potential impacts to drinking water protected areas and their assets. Scottish Ministers request that the company contacts Scottish Water to confirm any affected assets and includes relevant mitigation measures in the EIA report.	The Applicant notes that the ECU was satisfied with the scope of the EIAR as detailed in the Scoping Report. **Chapter 10: Water Environment** and **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)** provides the assessment of water level and flow changes and potential impacts on the water environment and water resources. An assessment of the impact on the Proposed Development on Private Water Supplies (PWS) is included in **Chapter 10: Water Environment (Volume 2: EIA Main Report)**. The assessment of impact on fish populations and related Special Areas of Conservation is set out in **Chapter 9 Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. The HRA regarding the potential effects to SACs is within **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices)**. A Peat Landslide Hazard and Risk Assessment is provided as an appendix **(Appendix 15.3 Preliminary Peat Landslide Hazard and Risk Assessment (Volume 5: Appendices))** to accompany **Chapter 15 Geology & Ground Conditions (Volume 2: EIA Main Report)** **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)** provides an assessment of landscape and visual effects.

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				- Scottish Ministers request that the Company investigates any private water supplies that may be impacted by the development. The EIA report should include details of identified supplies, potential impacts, risks, and proposed mitigation measures. - MD-SEDD provides generic scoping guidelines for onshore wind farm and overhead line developments, detailing how fish populations can be impacted during construction, operation, and decommissioning. The guidelines inform developers on what to consider regarding freshwater and diadromous fish and fisheries during the EIA process. - Developers should identify the main watercourses and waterbodies within and downstream of the proposed development area. They must also consider any Special Areas of Conservation where fish are a qualifying feature and assess proposed felling operations, especially in acid-sensitive areas, at an early stage. - Scottish Ministers believe that where a peat landslide hazard and risk assessment (PLHRA) is required, it should be included in the EIA process following best practice guidance. This will provide Ministers with a clear understanding of whether the risks are acceptable and can be controlled through mitigation measures. - The scoping report identified that a landscape and visual impact assessment will be undertaken, and a noise assessment should be carried out in line with relevant legislation and standards. Scottish Ministers must reach a reasoned conclusion on the significant environmental effects of the proposed development, as presented and identified in the EIA. It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers acknowledge that further engagement is needed between parties to refine the design of the proposed development.	**Chapter 14: Noise and Vibration (Volume 2: EIA Main Report)** provides an assessment of noise impacts. **Appendix 19.1 Mitigation Register (Volume 5: Appendices)** provides a schedule of mitigation measures. It is noted that this consultation tracker **(Appendix 4.3 Consultation Tracker (Volume 5: Appendices))** provides where within the EIAR specific matters raised from the Scoping Opinion and all other consultation is located.
2	The Highland Council, SEPA, NatureScot	14th August 2024	Pre-Application Advice Meeting	Pre-Application Advice meeting with attendants from THC, THC Landscape Officer, NatureScot and SEPA. Topics covered included planning policy, the landscape and visual approach, sensitive ecological sites including Urquhart Woods SAC, River Ness SAC, Moray Firth SAC, and SPAs	The pre-application meeting advice guided the approach to the EIAR. Additional viewpoints were included following input from the landscape officer and the scoping opinion. THC's written response after the meeting provided further details, which are addressed in more depth below.
3	The Highland Council	19th September 2024	Scoping Opinion	The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR must include a description of the physical characteristics of the whole development and the full land-use requirements throughout its lifecycle, a description of the main characteristics of the production processes, the risk of accidents (having regard in particular to substances or technologies used), an estimate of expected residues and emissions resulting from the operation of the development, and the estimated cumulative impact of the project with other consented or operational developments. A statement is required that outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to include the design evolution of the scheme including constraints to delivery, the range of technologies that may have been considered, locational criteria and economic parameters used in the initial site selection, options for access, design and	These are standard EIAR methodology and are detailed in **Chapter 4: Approach to EIA (Volume 2: EIA Main Report)**.

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				locational options for all elements of the proposed development (including grid connection), and the environmental effects of the different options. The assessment should also highlight sustainable development attributes including, for example, an assessment of carbon emissions / carbon savings.	
4	The Highland Council	19th September 2024	Scoping Opinion	The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. There are a number of renewable energy developments in the area, and they should be used in assessing the development and the potential for cumulative effects to arise. The EIAR must provide is relevant and robustly grounded information. The EIAR should recognise the existing land uses affected by the development having particular regard for THC's Development Plan inclusive of all statutorily adopted Supplementary Guidance (SG). This is in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and guidance on renewable energy should be considered in this section. It is noted that this proposal has already been submitted for major pre-application advice. The current Development Plan comprises the National Planning Framework 4(NPF4) adopted in 2023; the Highland-wide Local Development Plan (HwLDP) adopted 2012; and Inner Moray Firth Local Development Plan 2 (IMFLDP2) adopted 2024. A range of policies will apply to this scheme from all these plans and guidance. The scope of an EIA should address all the relevant issues covered in NPF4, HwLDP and the SG. Certain aspects of the IMFLDP2 for the local area/settlement may help to inform plans for community engagement or community benefit. IMFLDP2 defines boundaries (including any refinements) of the Special Landscape Areas (SLAs) across the plan area. Pumped hydro storage is classed as a national development in the National Planning Framework 4, but please note that whilst national development status provides in principle support, it does not grant planning permission, and all relevant consents are required. The HwLDP sets out a range of planning policies applicable for the whole The Highland Council area and should be used alongside NPF4. The IMFLDP2 focuses on regional and settlement strategies and identification of specific site allocations, may highlight priorities for the local area that should be taken into consideration when designing the development, or help to inform plans for community engagement and/or community benefit. The most relevant NPF4 and HwLDP policies to this proposal are found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices),** and for more details on all policies discussed above please refer to the fuller response in this proposal's pre-application advice 24/00617/PREMAJ.	**Chapter 5: Planning Policy (Volume 2: EIA Main Report)** and the Planning Statement accompanying the Section 36 application summarise the national, regional, and local planning policy guidance and development plan policies that are relevant to the Proposed Development.

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5	The Highland Council	19th September 2024	Scoping Opinion	The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a number of landscape and visual considerations, including both individual impacts and cumulative impacts with other energy schemes. The Council's Highland Hydro Storymap and the Highland wind turbine map can be used to maintain an up-to-date picture of development in the wider area. The Onshore Wind Energy Supplementary Guidance lists ten landscape and visual criteria that the Council use as a framework for assessing proposals, and these should be used to inform the applicant's own assessment. The Council has produced citations for Special Landscape Areas (SLAs) which summarise key characteristics, qualities, sensitivities, and measures for enhancement and must be used to assess the potential impacts of the proposed development. The proposal must have regard to the Loch Ness and Duntelchaig SLA. The EIAR must consider the landscape and visual impact of all elements of the development and should conform with the overall methodology set out in GLVIA3. Assessment of specific elements should have their own site layout and elevation plans. Landscape and visual impacts require separate assessment and therefore presentation of visual material in different ways. It is not possible to use panoramic images for the purposes of visual impact assessment, and instead single frame images are required. Specific details on these requirements and guidance can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** It should be noted that there are several renewable energy applications in the wider surrounding area that are yet to be determined/concluded in the vicinity of the application, which may or may not help clarify the weight towards particular policy elements in the final planning balance. It is recommended that the Wind Turbine map is used to identify other schemes within the Study Area. GLVIA3 defines Visual Effects as not just effects on views, but as "Effects on specific views and on the general amenity experienced by people". Some viewpoints should be "Specific Viewpoints", addressing key and promoted views, while others are "representative viewpoints" which represent effects on particular types of receptor in a more generalised area where similar effects may be experienced over a wider geographical area, with some "illustrative views" chosen to demonstrate a particular effect. The LVIA should clearly spell out which category each viewpoint falls into and ensure that the analysis assesses the effects on specific view and the effects on general amenity experienced by people. Use the term "Hours of Darkness" over "Night-Time". It is pertinent to the assessment to understand that Hours of Darkness Effects will be visible during people's working day and commuting hours for a significant part of the year and that sensitivities of receptors to these effects must account for this.	• The Landscape and Visual team have been involved in the location, siting and design of the Proposed Development to seek to minimise effects. The LVIA sets out the anticipated effects on landscape and visual receptors arising from the Proposed Development in **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)**. • The Applicant has referred to the Highland Hydro Storymap and Highland wind turbine map where appropriate to inform the LVIA. • The Applicant has referred to ten criteria for assessing proposals within the Onshore Wind Energy Supplementary Guidance where relevant to inform the LVIA. • Citations for relevant SLAs have been included within the landscape baseline to inform the assessment of effects. This will include the Loch Ness and Duntelchaig SLA. • The LVIA conforms to relevant guidance, including GLVIA3 and TGN 06/19 Visual Representation of development proposals. • Visualisations will be provided to The Highland Council Standards and NatureScot guidance. The visualisations can be seen in **Volume 4: Visualisations**. • The use of monochrome has been considered when preparing the visualisations. • The Landscape and Visual Impact Assessment (LVIA) will assess the impact of all parts of the Scheme set out within **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)**. on landscape and visual receptors.

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				Gardens and Designed landscapes are considered as assets and therefore, it would be appropriate for any aspects relating to landscape setting, or relationship to the wider landscape to be considered in the LVIA chapter, if necessary, in addition to appearing in the Cultural Heritage Chapter. THC acknowledges that there will be some micrositing of the viewpoints to avoid intervening screening of vegetation boundary treatments. The purpose of the selected and agreed VPs shall be clearly identified and stated in the supporting information. The photographer should know whether the VP is representative or specific, and who the receptors are. A 3D model may be useful. Note that forestry is not considered a permanent fixture in the landscape and thus LVIA's are expected to assume bare earth, along with "permanent" physical infrastructure, baseline conditions, so that effects are understood based on worst case scenarios. The LVIA Chapter of the EIAR should clearly set out the methodology including: • Definitions of each point on the scale of magnitude of change which is used by the applicant in reaching a conclusion on the magnitude of change; • Definitions of each point on the scale of sensitivity of receptor which is used by the applicant in reaching a conclusion on the sensitivity of receptor; • The threshold to which the applicant considers a significant effect is reached. THC considers Moderate impacts as significant, and the EIAR takes this approach as well; • A clear matrix approach supported by text setting out how you have reached your conclusion of effect on landscape character, designated landscapes, visual receptors, and residential amenity. When assessing the impact on recreational routes ensure that all core paths and long-distance trails, are assessed. Assessments should include a sequential assessment of how the development will be experienced in relation to existing and renewable energy developments, and an assessment of visual impacts on surrounding settlements. Cumulative impact is considered a significant material consideration in the final determination of any future application, and thus an appropriate cumulative impact assessment is required. It is expected that the applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. Details can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The Landscape Impact Assessment should refer to the Council's Onshore Wind Energy Supplementary Guidance and an assessment of the proposal against the criterion set out must be included within the LVIA chapter of the EIAR. The site is located within the Loch Ness Landscape Character Areas Study referenced in the Onshore Wind Energy Supplementary Guidance. THC's Landscape Officer reiterated that the LVIA should include any cumulative effects arising from interaction with existing and proposed wind energy developments. While the developments are very different in nature, both represent large scale, man-made interventions in the landscape, with potential to change the perception of scale and distance within the landscape. The Landscape Officer also requested an additional	• The Applicant will refer to the interactive Wind Turbine map where relevant to inform the LVIA. An assessment of cumulative effects will be included within **Chapter 6, Landscape and Visual (Volume 2: EIA Main Report)**.

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				viewpoint from Meall Fuar-Mhonaidh itself and noted a claimed right of way to the north of Loch Nam Breac Dearga. An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. Any development on the shore of Loch Ness should be considered in the context of the Loch Ness and Duntelchaig Special Landscape Area, in particular with regard to the Key Landscape and Visual Characteristic of the combination of the horizontal water's surface with adjacent steep slopes creating a simple and distinctive profile. The impacts of any lighting must be assessed through the EIA process. Further advice on lighting is available from NatureScot, however, generally the impact of lighting on WLA's and SLA's and areas where there would be an expectation of dark skies should be included. The Landscape Officer has expanded further on some of the points raised above in their comments for 24/00617/PREMAJ.	
6	The Highland Council	19th September 2024	Scoping Opinion	The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This requires identification of the architectural heritage (Conservation Areas, Listed Buildings); the archaeological heritage (Scheduled Monuments); the landscape (including designations such as National Parks, National Scenic Areas, Special Landscape Areas, Gardens and Designed Landscapes and general setting of the development; and the inter-relationship between the above factors. Any assessment should contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. Where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views towards and away from the development in relation to the sites and their settings could be helpful. Historic Environment Scotland have provided further comments as part of the 24/00617/PREMAJ response.	The assessment of heritage assets is included in **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)**.
7	The Highland Council	19th September 2024	Scoping Opinion	The presence of Schedule 1 Birds and/or European Protected Species must be included and considered as part of the planning application process. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to any comments from NatureScot and RSPB in this respect. An assessment of the impacts to birds through collision, disturbance, and displacement from foraging/breeding/roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.	Survey for Schedule 1 birds and European Protected Species has been carried out and the assessment of impacts upon them is a key part of the EIA. The full details on the impacts on birds will be assessed and detailed in **Chapter 8: Ornithology (Volume 2: EIA Main Report)**, including cumulative impacts. Bird survey methodology has been discussed with NatureScot and is clearly set out in the EIAR.

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8	The Highland Council	19th September 2024	Scoping Opinion	The EIAR should provide a baseline survey of the bird and animals on site, clearly identifying what species are present on the site and where and provide an account of habitats present. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide. The EIAR should address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans. The developer should undertake a specific peat assessment to inform the siting, design, or other mitigation in order to overcome significant effects on peatland and Carbon Rich Soils, Deep Peat, and Priority Peatland Habitat (CPP). Note paragraph 4.34 on page 24 of the OWESG, which discusses peat and CPP. An up-to-date National Vegetation Classification (NVC) survey is expected and a commitment to undertake peatland restoration over an area larger than the application site. The EIAR should provide details of all direct, indirect, permanent, and temporary impacts to any bog habitat present on the site. The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. NatureScot provide advice on the impact on designated sites. If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats, and other interests. The EIAR needs to address the aquatic interests within local watercourses, including downstream interests that may be affected by the development, for example, increases in silt and sediment loads resulting from construction works; pollution risk/incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds/timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant. Further advice can be found in NatureScot's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken. The EIAR should include a map and assessment of impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers, these habitats are easily damaged by insensitive drainage. A draft or outline Habitat Management Plan (HMP) and Species Protection Plan (SPP) should be produced as part of the EIAR, including any proposals for mitigation and enhancement in relation to important habitats and species. Any compensatory planting plans should be carefully considered and included in the HMP. The HMP should include a comprehensive monitoring programme for all habitat improvements, and breeding birds on the site. Remote sensing using radar or infra-red cameras should be considered, to help inform future development and decision making within the industry with regards to eagles. Lastly, the HMP (or other document) should also include a protocol for reporting collisions to NatureScot.	Survey for Schedule 1 birds and EPS has been carried out and informs the assessment of impacts in **Chapter 8: Ornithology (Volume 2: EIA Main Report)**. All possible impacts on birds are being assessed, including cumulative impacts. Bird survey methodology has been discussed with NatureScot set out in **Section 8.5 Methodology** of **Chapter 8: Ornithology (Volume 2: EIA Main Report**). The results of peatland surveys are detailed in are separately detailed in **Chapter 15: Geology and Ground Conditions** (**Volume 2: Main Report**); NVC survey results (including of native woodland habitats) are discussed in **Chapter 7: Terrestrial Ecology (EIA Main Report)** and detailed in **Appendix 7.3: Habitats** (**Volume 5: Appendices**). The potential for increased deer pressure on retained terrestrial habitats, through loss of habitats used by deer to the Proposed Development, has been considered within **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)**. Proposed biodiversity enhancement and compensation measures are detailed in the **oLEMP (Appendix 6.4 Outline Landscape and Ecology Management Plan (Volume 5: Appendices))**. Biodiversity Net Gain calculations are reported in the **oLEMP**. Note that blanket bog is regarded as 'irreplaceable' in BNG metrics and is instead addressed under the NatureScot lost: restored + enhancement ratio of 1:10 + 10%, carried out by on-site and (mainly) off-site restoration.

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						All woodland has been identified through field survey and desk study, and impacts on woodland are addressed **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)** and **Chapter 18: Forestry** (**Volume 2: Main Report**). The design has been adjusted to largely avoid ancient woodland and minimise loss; Woodland, montane scrub and other habitat measures to provide compensation and enhancement are set out in the **oLEMP**.
9	The Council	Highland	19th September 2024	Scoping Opinion	NPF4 Policy 3b. is applicable and requires biodiversity enhancement of the site post-construction in addition to mitigation and compensation measures. In order to satisfy Policy 3b. a Biodiversity Enhancement and Management Plan (BEMP) that details how criteria i. to v. will be met, will be required in addition to the Ecology Assessment. This will demonstrate that the development will significantly enhance the biodiversity of the site from its pre-development state by at least 10%. Where the BEMP is unable to demonstrate to the satisfaction of the planning authority that the development will conserve, restore and enhance biodiversity, the proposal will not be supported. The BEMP must demonstrate to the satisfaction of the Planning Authority that the development will accord with Policies 57-60 of the HwLDP and be carried out by a suitably qualified and experienced consultant. In rare cases where site constraints result in the applicant being unable to deliver one or more of the above criteria, consideration may be given to developer contributions as to enable biodiversity enhancements to be implemented elsewhere in line with the mitigation hierarchy to allow offset, off- site measures.	Proposed biodiversity enhancement and compensation measures are detailed in the **oLEMP (Appendix 6.4 Outline Landscape and Ecology Management Plan (Volume 5: Appendices))**. Biodiversity Net Gain calculations are reported in the **oLEMP**. Note that blanket bog is regarded as 'irreplaceable' in BNG metrics, and is instead addressed under the NatureScot lost: restored + enhancement ratio of 1:10 + 10%, carried out by on-site and (mainly) off-site restoration;
10	The Council	Highland	19th September 2024	Scoping Opinion	The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features including bog pools surrounding the proposed infrastructure, and sensitive receptors such as water supplies, need to be assessed and demonstrated that they will not be degraded by site drainage and excavations. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall that will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. The applicant should consult SEPA early regarding the Controlled Activities Regulations (CAR). The EIAR should include a map of engineering activities, proposed buffers, flood risk details, and CAR application information. SEPA will confirm if a CAR license is needed and the required details. Note that SEPA has a general presumption against modification, diversion or culverting of watercourses, so this should be avoided where possible. The EIAR will be expected to identify all water crossings and include a table, photography and dimensions of watercourse crossings or channelling, with detailed justification and design of such elements. A decision tree may be useful to demonstrate choice of crossing.	**Chapter 10: Water Environment** and **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)** address all stated points including the list of all watercourse crossings. The Applicant has Consulted with SEPA on the preparation of the CAR licence which will be submitted shortly after the Section 36 application. The Private Water Supply assessment is in **Chapter 10: Water Environment (Volume 2: EIA Main Report**).

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				The following applies to watercourses: • All tracks should be kept a minimum 10m away from any waterbody except water crossings; • Access tracks not acting as preferential pathways for runoff and efforts being made to retain existing natural drainage wherever possible; • Natural flood management techniques should be applied to reduce the rate of runoff where possible; use of SuDS to achieve pre-development runoff rates and to minimise erosion on existing watercourses; • Water crossings in the form of culverts or bridges, or upgrades to existing crossings must be designed to accommodate to 1 in 200-year flood event, plus climate change; • Land rising within any floodplain to be avoided; if ultimately required, compensatory storage must be provided; and, • The EIAR should be informed by the Council's Flood Risk and Drainage Impact Assessment Supplementary Guidance. The EIAR should identify water abstraction needs, specifying public or private sources. The applicant must investigate private water supplies and submit measures to prevent contamination or disruption. This should include a mapped assessment of groundwater impacts and buffers. An on-site survey will be required. Before development begins, the applicant must investigate private water supply infrastructure that may be affected. A report detailing prevention measures, monitoring plans (before, during, and after construction), and contingency measures must be submitted for Planning Authority approval. An on-site survey will be required. The development is expected to involve a significant workforce, and a Housing Strategy will be submitted outlining accommodation options. This will include temporary on-site housing where feasible, along with local accommodation, park-and-ride, and other solutions. One of the implications may be the need to utilise a new or existing private water supply, so any application must include a completed PWS Planning Questionnaire (Form PWS 1) and written report from a competent person that confirms the accommodation will be served by a sufficient piped supply of wholesome water. The applicant must demonstrate sufficient water supply for all properties and activities. If the source is shared, the report must confirm no adverse impact on existing users. Calculations should assume 200 litres per person per day at maximum occupancy. Sufficient information to demonstrate that the water can meet the water quality standard requirements (The Private Water Supplies (Scotland) Regulations 2006 or The Water Intended for Human Consumption (Private Supplies) (Scotland) Regulations 2017). The report shall include a risk assessment which identifies potential sources of contamination and state the measures which will be taken to minimise the risks to anyone using the supply;	Regarding the Temporary Workers Accommodation, it is proposed that it will utilise the mains supply.

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				A description of any proposed treatment systems. The choice and design of any treatment system should take into account any foreseeable variability in raw water quality	
11	The Highland Council	19th September 2024	Scoping Opinion	The Highland Council's Environmental Health Team notes the Scoping Report advises that a construction noise and vibration assessment will be undertaken in accordance with BS 5228-1:2009+A1:2014. The assessment should include but is not limited to the following. Details on what the assessment should include and the recommended noise and vibration limits for the project can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** While planning conditions typically don't control construction noise, incorporating noise limits into the consent may be advisable to ensure clear standards from the outset. The applicant must submit a detailed Construction Environmental Management Plan (CEMP) for planning authority approval, including noise and vibration mitigation, monitoring, and a complaint communication process. Establishing a liaison group with the local community is recommended. The developer may consider conducting a pre-construction survey of properties where vibration might be noticeable, establishing a baseline for assessing potential structural damage complaints. The applicant's scoping report advises that an operational noise and vibration assessment will be undertaken in accordance with British Standard BS 4142: 2014 "Method for rating noise affecting mixed residential and industrial areas". The assessment should demonstrate that Noise arising from this development will not have an adverse impact on existing noise sensitive properties. Monitoring locations must be agreed beforehand with Environmental Health. It is understood a qualitative analysis of operational ground borne vibration and ground-borne noise will be undertaken in cognisance of the guidance in BS 6472-1:2008 "Guide to evaluation of human exposure to vibration in buildings" and BS 7385-2:1993 "Evaluation and measurement for vibration in building". The applicant will be required to submit a separate noise assessment in respect of the proposed substation/switching station which demonstrates that noise will meet standards. The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated within the operational land of the sub-station, must not exceed the current background noise levels at noise sensitive premises. The Rating Level should be calculated in accordance with BS 4142: 2014+A1:2019 Methods for rating and assessing industrial and commercial sound. Details on standards required for assessments can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	Direct contact was established with the EHO to ensure that the assessment aligned with requirements. The noise monitoring approach was agreed with the EHO. The details of the noise and vibration assessment can be seen in **Chapter 14: Noise and Vibration (Volume 2: EIA Main Report)**.
12	The Highland Council	19th September 2024	Scoping Opinion	Prior to the development commencing, the applicant shall submit, for the written approval of the planning authority, details of a dust mitigation scheme designed to protect neighbouring properties from dust arising from this development. Particular attention should be paid to the formation of new access tracks and construction traffic.	An Outline Dust Mitigation Plan has been prepared as part of the CEMP **Appendix 3.1 Construction Environmental Management Plan (Volume 5: Appendices)**.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
13	The Highland Council	19th September 2024	Scoping Opinion	THC's Transport Planning Team will focus on the impact of development traffic on the council-maintained road network during construction. Transport Scotland will focus on the impact on the trunk road network. The Transport Planning Team agrees to scope out traffic and transport matters for decommissioning but only agrees to scope out the operational phase if no new visitor centre is included. If a visitor centre is part of the proposal, the EIA and Transport Assessment (TA) should address its impact. The EIA's traffic and transport study area should consider the port of entry for abnormal loads (AILs) and their routing to the site, as well as sourcing key materials like aggregate, concrete, and bitumen. If materials from Breedon Quarry at Beauly are used, the A833 north of Cannich, unsuitable for large commercial vehicles, may require extensive improvements. The assessment should address this and propose necessary improvements or alternative routing. Clarification of the intended access option for construction and ongoing operational access to and from this development is required, and it must inform the scope of the EIA and TA work done. Transport Planning's preference would be for the means of access to make the best-use of the route hierarchy in that area and to take access direct from the Trunk Road Network. Should there be local public roads impacted, the scope of the assessment work required through the EIA and supporting TA work should adequately cover the requirements set out. When comparing construction traffic impacts to existing surveyed traffic flows, use existing 12-hour flows between 07:00 – 19:00, not 24-hour annual average daily traffic flows. When quantifying predicted construction-related traffic, the submission should clearly outline all assumptions made. The potential impact on traffic movements if these assumptions prove inaccurate should be assessed through sensitivity tests to understand the likely implications. Transport Planning note the intention to follow the IEMA Guidelines 2023 for assessing the environmental implications of the developments traffic and transport impacts, but it is insufficient for determining the condition and physical capability of any local public roads. Any TA submitted will be required to assess the physical condition and capability of impacted local public roads and, where deemed necessary, justify the adequacy of proposed physical improvements to keep those routes operationally safe for all users, including construction traffic, throughout the works. Transport Planning also note the intention to use the following rules from the IEMA Guidelines 2023 as triggers for requiring further consideration of the environmental implications from traffic associated with the construction and operation of the new facility: • Rule 1: Road links where traffic flows or HGV's increase by more than 30%. • Rule 2: Road links of high sensitivity where traffic flows or HGV's increase by more than 10%.	**Chapter 13: Access, Traffic and Transport (Volume 2: EIA Main Report)** addresses all stated points. It was clarified that a visitor centre is not included as part of the Proposed Development.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				Any sections of single-track public road with passing places must be deemed as high sensitivity and adhere with the requirements of Rule 2. The above information is not exhaustive and shall be used as a guide. The EIAR must also consider the implications on the Trunk Road network. A note regarding matters to be included in the Transport Statement is attached with The Highland Council's Scoping opinion found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	
14	The Highland Council	19th September 2024	Scoping Opinion	The EIAR must consider the risks of engineering instability relating to presence to peat on the site, thus a comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers is expected. Assessment should include pollution risk and environmental sensitivities of the water environment. The EIAR should include a detailed map of peat depth and demonstrate efforts to minimize impact on deep peat areas. It should outline site-specific construction method principles for works in peatland areas. Policy 55 Peat and Soils, of the HwLDP, states that development proposals should demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils. The mitigation hierarchy must be followed, with impacts avoided and minimised where possible. SEPA can provide detailed advice on methodology for peat probing and the peat assessment. The peat depth survey should be presented as a table detailing re-use proposals. Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period. The EIAR should detail the likely significant effects of the development on local geology, covering aspects like borrow pits, earthworks, site restoration, and soil impacts. It should include construction practices to minimize raw material use and maximize secondary aggregates or recycled materials. For borrow pits, the EIAR should provide details on location, size, depth, reinstatement profile, Site Management Plans, and pollution prevention measures. Borrow pits should be sited to minimize environmental impact, and any offsite aggregates used should not affect groundwater chemistry or cause siltation in waterbodies or wetlands. and pollution prevention measures. In order to protect peatland and limit carbon emissions from carbon rich soils a Peatland Management Plan (PMP) should be provided. Details on what the PMP must include can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The Peatland Condition Assessment photographic guide lists the criteria for each condition category and illustrates how to identify each condition category. Handling and temporary storage of peat should be minimised. Catotelmic peat should be kept wet, covered by vegetated turves and re-used in its final location immediately after excavation. It is not suitable for use in verge reinstatement, re-profiling/landscaping, spreading, mixing with mineral soils or use in bunds.	**Appendix 15.3 Preliminary Peat Landslide Hazard and Risk Assessment (Volume 5: Appendices)** details the outline approach to peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for developments. The construction method applied in relation to peat, as well as the approach to protect peatland and limit carbon emissions from carbon rich soils, will be outlined in **Appendix 15.2 outline Peat Management Plan (oPMP) (Volume 5: Appendices)**. The approach to peat restoration set out in the oPMP has been informed by habitat surveys set out in **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)**.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				Disposal of peat is not acceptable. It should be clearly demonstrated that all peat disturbed by the development can be used in site reinstatement (making good areas which have been disturbed by the development) or peatland restoration (using disturbed peat for habitat restoration or improvement works in areas not directly impacted by the development, which may need to include locations out with the development boundary).	
15	The Highland Council	19th September 2024	Scoping Opinion	The proposed development site is located within predominantly open ground but there are still significant areas of non-native and native productive conifer and native broadleaves along the side of Loch Ness, around Glen Coiltie and in the FLS woodland to the south of the A831. NPF4 Policy 6 b) notes that Development proposals will not be supported where they will result in: i. Any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition; ii. Adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value; iii. Fragmenting or severing woodland habitats, unless appropriate mitigation measures are identified and implemented in line with the mitigation hierarchy. NPF4 Policy 6 c) notes that Development proposals involving woodland removal will only be supported where they will achieve significant and clearly defined additional public benefits in accordance with relevant Scottish Government policy on woodland removal. Where woodland is removed, compensatory planting will most likely be expected to be delivered. The Control of Woodland Removal policy notes that "There will be a strong presumption against removing the following types of woodland: ancient semi-natural woodland; … or woodlands listed as 'Plantations on Ancient Woodland Sites' (PAWS)….". There appears to be development in productive conifer woodland as well as through mature native woodland listed in the AWI, and applicant will need to minimise the adverse impact on native and ancient woodland, in line with NPF4. The scoping proposals in the Forestry Chapter are broadly accepted, but the chapter appears to only cover productive forestry, and the indicative layout still appears to show significant adverse impact on ancient woodland. The Terrestrial Ecology Chapter does not appear to give much reference to native woodland, just pine woodland, with no mention of native broadleaf woodland. Ensure that native woodland around Inchtellach House and Corby Wood is identified and fully considered at this stage. The applicant must provide an ES including a baseline survey of all woodlands, trees, and plants on site, identifying any rare or threatened species. This could include a Forestry Chapter detailing productive woodland and a Terrestrial Ecology Chapter covering native woodland. The ES should also assess the impact on different types of woodland, including those listed in the AWI and NWSS. The applicant should design the layout to minimize impacts on woodland, especially native broadleaf woodland and areas listed on the AWI as ASNO. The ES should include Tree Constraints Plans and Tree Protection Plans (BS 5837:2012) to demonstrate how retained trees/woodland will be protected during	The identification of woodland and the potential impacts are considered within both **Chapter 7: Terrestrial Ecology** and **Chapter 18: Forestry (Volume 2: EIA Main Report).** Detailed information on native woodland habitats including NVC are made available within **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)**.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				construction, and a tree/woodland removal drawing should be provided. A Landscape Plan and Landscape Maintenance Plan should be provided which shows how trees to be removed are to be replaced with on-site planting and how the visual amenity of the local landscape is to be enriched. If woodland removal is proposed, the applicant must demonstrate compliance with the Scottish Government's Control of Woodland Removal policy. Compensatory planting, equivalent in scale and type to the removed woodland, is expected, with any planting likely to be off-site.	
16	The Highland Council	19th September 2024	Scoping Opinion	Considering the nature of the site presented in the Scoping Report, there are no specific concerns about contaminated land.	No further action required
17	The Highland Council	19th September 2024	Scoping Opinion	It is considered that Socio-economic, Recreation and Tourism should have its own chapter in the EIAR. The EIAR should assess who may be affected by the development, including individual households, local communities, tourists, businesses, and recreational groups. It should include economic information related to the project, such as the number of jobs created and the economic activity during procurement, construction, operation, and decommissioning. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.	**Chapter 16: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)** addresses all stated points.
18	The Highland Council	19th September 2024	Scoping Opinion	Benefits to rural areas, such as provision of jobs and opportunities to restore and protect natural habitats, are highlighted in Scottish Government Policy documents, with the aforementioned Policy Statement reinforcing the notion that the right development should be permitted in the right place. The Council maintains that renewable energy developments should be located, sited, and designed appropriately and thus assessed against the wider development plan policies. Developer Contributions, Community Benefit & Community Wealth Building will all need to be considered as the scheme develops with Developer Contributions sought towards Transport (including Active Travel), Green Infrastructure, Water & Waste and Public Art/Realm in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018). The Council has a separate remit to promote community benefit which is distinct and separate from planning. The policy contains contacts for further discussion on this matter and we would encourage the developer to engage early in the process. The approved charter sets out The Highland Council's expectations from developers wishing to invest in renewables in the Highland area and what the Highland partnership – public, private, and community – will do to support and enable this contribution. Further details can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	The Applicant is committed to delivering community benefits and is actively engaging with stakeholders, including THC, to develop a tailored Community Benefit Package. Ongoing conversations about community benefits have been taking place including workshops that took place in early 2025.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				Community Wealth Building is intended to encourage, promote, and facilitate a new strategic approach to economic development as set out in NPF4 Policy 25. This Policy indicates examples of what contributions by development proposals to community wealth building could include.	
19	The Highland Council	19th September 2024	Scoping Opinion	THC's Access Officer notes there are two aspects of the project to consider from the Access Authority's perspective. One is the impact which the construction phase and permanent works have on existing access routes. The other is what opportunity exists in terms of access improvements as a legacy of the project. This proposal has the potential to have a significant negative impact on public access. It will affect public rights of way, core paths, long distance trails, the Great Glen Way, the Great Glen Canoe Trail and several other old, new and proposed parts of the wider paths network. Its impact on public access should be assessed in accordance with NatureScot's handbook on EIA. The Access Officer noted that early direct engagement with the Council's Long Distance Routes team is essential.	All public rights of way, core paths, long distance trails as well as the Great Glen Way and the Great Glen Canoe Trail and additional recreational routes have been included **within Chapter 16: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)**. The assessment has used the guidance set out in the Environmental Impact Assessment Handbook: Guidance for competent authorities, consultation bodies, and others involved in the Environmental Impact Assessment process in Scotland (NatureScot, 2018).
20	The Highland Council	19th September 2024	Scoping Opinion	The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction etc. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation, and decommissioning. Issues such as dust, air borne pollution and/or vapours, noise, light, shadow-flicker can then be highlighted. Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw. Depending on the proximity of the working area to houses etc. the applicant may require submitting a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements. A number of the aforementioned matters should be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application as well as an outline Decommissioning and Reinstatement Plan.	Any climatic factors are considered when appropriate in the relevant chapters 6-18 of **Volume 2: EIA Main Report.** Health and safety risks from lighting strikes and ice throw are not considered relevant to the Proposed Development. An Outline Dust Management Plan has been prepared as part of the oCEMP **(Appendix 3.1 Outline Construction Environmental Management Plan (Volume 5: Appendices)**. Though it is considered that the Proposed Development is a sufficient distance away from houses. The CEMP will provide the information and matters to address which the THC refers to as the CEMD.
21	The Highland Council	19th September 2024	Scoping Opinion	Glengarry Community Council submitted comments regarding the contents of the EIAR, which can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** There are no specific comments that need to be addressed.	Noted. The Buglife representations and the Applicant's response can be viewed in full within this Consultation Tracker at ID 84 .

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				Buglife submitted comments regarding the scope of macroinvertebrate and terrestrial invertebrate surveys to inform the EIAR. These can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	
22	The Highland Council	19th September 2024	Scoping Opinion	The EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium, and long-term, permanent and temporary, positive and negative effects of the development, resulting from the existence of the development; the use of natural resources; and the emission of pollutants, the creation of nuisances and the elimination of waste. The potential significant effects of development must have regard to the extent, trans-frontier nature, magnitude, complexity, probability, the duration, frequency, and reversibility of the impact. Effects should be measured using a four-point scale: strong positive, positive, negative, or strong negative. The applicant should provide a description of the forecasting methods used to assess the effects on the environment. Consideration of the significance of any adverse impacts of a development will be balanced against the projected benefits. Valid concerns can be overcome or minimised by mitigation by design, approach, or the offer of additional features, both on and off site. The EIAR must table and describe measures to prevent, reduce, and offset any significant adverse effects on the environment, with these measures carried through in the development application, in a 'Schedule of Mitigation'. As the development progresses, this will progress to a Construction Environmental Management Document (CEMD) and then Plan (CEMP), which in turn will set the framework for individual Construction Method Statements (CMS). The EIAR should specify which parties, including local liaison groups, are involved in the implementation of mitigation measures. It should clarify the group's remit, management, and resources, especially for tasks like abnormal load deliveries, construction works and borrow pit blasting.	These are standard EIA methodology and are detailed in **Chapter 4: Approach to EIA (Volume 2: EIA Main Report)**.
23	The Highland Council	19th October 2024	Pre-Application Advice	Pumped Storage Hydroelectric schemes are recognized as national developments in National Planning Framework 4, confirming their established need. THC supports renewable energy projects and infrastructure if they are suitably located and designed to avoid significant overall harm. However, this site presents notable challenges, with concerns highlighted in the pre-application response requiring further information to address. These include concerns regarding - The potential impacts on the qualifying interests of River Moriston SAC, Urquhart Bay Woods SAC and Moray Firth SAC. - Landscape and visual impacts on the Loch Ness and Duntelchaig Special Landscape Area both in isolation and any cumulative schemes. Visualisations and a strong mitigation strategy is essential. - Phasing of the works. - The disturbance of carbon rich soils and peatland. A Peat Management Plan is required, confirming the volume of peat disturbed and how it will be used in successful restoration - Biodiversity enhancement in compliance with Policy 3 – Biodiversity of NPF4. A Biodiversity Enhancement and Management Plan will be required. - Ecological/environmental constraints.	The EIAR addresses all stated points from the pre-application advice.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				- The impact on the A833 road north of Cannich. A Transport Statement/Assessment is required. - Public access during all phases of the proposed development. An Outdoor Access Plan or Access Management Plan is required. - Flood events, flood risk, and the impacts on Ground Water Dependant Terrestrial Ecosystems. A Flood Risk Assessment and a Drainage Impact Assessment is required. The proposed development will require a CAR application which should be aligned with the Section 36 consent. - The potential impacts on scheduled monuments in the wider surrounding area and shore of Loch Ness - Private water supplies - Pollution and amenity impacts - Lighting - Use and restoration of borrow pits - Construction worker's accommodation. Detail can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	
24	The Highland Council	19th October 2024	Pre-Application Advice	Any future application(s) will be assessed against NPF4 and the Council Development Plans identified in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The applicant/agent must fully review and consider all relevant documents prior to a formal submission. Pumped Hydro Storage is classed as a national development under National Development No. 2. The most relevant NPF4 policies to this proposal are Policy 1, 3, 4, 11 and 29. Details of these and additional policies can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** Sub-section b) of the NPF4 Policy 3 requires national & major developments and developments that requires an Environmental Impact Assessment to meet specific criteria: - The proposal must be based on an understanding of the site's existing characteristics and its ecological context, including the presence of irreplaceable habitats. - Nature-based solutions should be integrated and utilized wherever feasible. - An assessment of potential negative effects must be carried out, with full mitigation in line with the mitigation hierarchy before considering enhancements. - Significant biodiversity enhancements are provided, in addition to any proposed mitigation. Management arrangements for their long-term retention and monitoring should be included. - Consideration of local community benefits of the biodiversity and/or nature networks. The Highland Council's Biodiversity Enhancement Planning Guidance has been prepared to support the application of the National Planning Framework 4 (NPF4). This, and the Scottish Government's draft biodiversity planning guidance, are intended to be used in conjunction with relevant national and local policy and planning guidance. The Scottish Government's Biodiversity Metric for Scotland's planning system should be used to assist in evaluating the biodiversity enhancements resulting from developments.	**Chapter 5: Planning Policy (Volume 2: EIA Main Report)** includes planning policy of relevance including the policies and development plans set out in the pre-application advice.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				A Landscape and Visual Impact Assessment will be required to assess compatibility with NPF4 Policy 4. Sections of the NPF4 Policy 11 note development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported, but only where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Section e) requires project design and mitigation to demonstrate how the specific impacts are addressed. Details can be found in Appendix **4.2 Scoping Opinion (Volume 5: Appendices).** In considering these impacts, significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets. The Highland-wide Local Development Plan (HwLDP) (2012) must be used alongside NPF4, and the relevant policies are 28, 57, 61, and 67. The Council must be satisfied that the development is located, sited and designed in a way that will not be significantly detrimental to a number of considerations as set out in the policies, which includes both individual impacts and cumulative impacts with other schemes. Details of these relevant and additional policies in the HwLDP can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** Area Local Development Plan – Inner Moray Firth Local Development Plan 2 (IMFLDP2 2024). The Highland Council Area Local Development Plan covering the proposed site is the Inner Moray Firth Local Development Plan 2 adopted in 2024. Certain aspects of the strategy for the local area/settlement may help to inform plans for community engagement or community benefit. The Council's Onshore Wind Energy Supplementary Guidance (2016) includes a landscape sensitivity appraisal for the Loch Ness study area, and could be of assistance in identifying landscape sensitivities, and therefore should be used.	
25	The Highland Council	19th October 2024	Pre-Application Advice	The Council's Sustainable Design Guide: Supplementary Guidance provides advice and guidance, and a Sustainable Design Statement is required. THC encourage the inclusion of electric car charging facilities within all new developments, thus a strategy for the provision of charging points should be included. The Council recognises the importance of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and committed to its own Climate and Ecological Emergency declaration. Given Highland's land mass and geography make up and resources, it is accepted that the area has enormous potential to significantly contribute to the production of renewable energy and play a key role in energy storage. NPF4's strong position of "in principle" support for renewable energy developments, and for energy storage in national development 2 and Policy 11, such developments should still be located, sited and designed appropriately and comply with the wider development plan policies. Scottish Government's Draft Energy Strategy and Just Transition Plan sets out actions regarding the future energy system and should be consulted.	N/A

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				The Council is currently preparing its Decarbonisation Strategy as part of its ambitions for Net Zero, such as fuel/energy options for its fleet of vehicles, alongside other opportunities.	
26	The Highland Council	19th October 2024	Pre-Application Advice	While the project will likely seek a consent for a number of years, provisions should be made for decommissioning of the development either if the project is not progressed beyond initial works, is not completed or if the project no longer is viable to operate. An outline decommissioning and restoration plan should accompany the application, and any EIA should consider the impact of decommissioning	Subsequent to the pre-application advice stated it has been agreed with THC that decommissioning is scoped out. This is on the basis that PSH can expect an operational life of up to 100 years.
27	The Highland Council / NatureScot	19th October 2024	Pre-Application Advice	The Pre-Application Advice provided a summary of advice from other consultees. This included NatureScot. In summary NatureScot's advice remained the same as provided on the 25 June 2024 in their Scoping Response to Energy Consents Unit. They have therefore only commented on the impacts on the qualifying interests of River Moriston SAC, Urquhart Bay Woods SAC, and Moray Firth SAC.	Please see ID 46-52 of this Consultation Tracker to see NatureScot's full Scoping Opinion and the Applicant's Scoping Response.
28	The Highland Council	19th October 2024	Pre-Application Advice	The site lies within the Rocky Moorland Plateau Landscape Character Type, and the design concept should seek to emulate the characteristics of ruggedness, rocky outcrops and absence of human artefacts. It is not expected that such a development can be entirely 'disguised', but respectful design will assist in limiting the prominence of the development in the landscape. In particular the outline of the head pond and the character of its embankments must be carefully considered, and designs will require comprehensive plans for embankment landscaping and stone dressing. The Access route proposed comes in through the Wooded Glen – Inverness LCT. In The Highland Council's Onshore Wind Energy Supplementary Guidance, Part 2, this LCT is identified as LN1: Glen Urquhart, Wooded Glen where it is assessed as having some sensitivity to Access Infrastructure and it is noted that such development should be well sited and exploit existing routes. Impact and visibility of access tracks in the landscape should be considered, taking into account the excavation and building up of ground required for the access tracks. The route, regrading and contouring of the land will need to be looked at to reduce the overall impact. Little information is available at this stage about the nature of the required level of built structures on the shore of Loch Ness, but any development here should be considered in the context of the Loch Ness and Duntelchaig Special Landscape Area, in particular with regard to the Key Landscape and Visual Characteristic of the combination of the horizontal water surface and the adjacent steep slopes creating a simple and distinct profile. Overall, detailed attention to design will be important to the experience of the development from people out in the landscape, this should extend to careful consideration of exposed materials, soft landscape mitigation and ongoing maintenance of the appearance of structures. The visual impact of the proposal will be most prominent during the construction period and until the time that the landscaping proposed to screen and integrate the development into the landscape has matured. Through careful design of the infrastructure there will be opportunity to mitigate visual impacts by design. Photomontages and design sections should clearly show the relevant elements of the scheme at year 1 and year 15, and it should be noted that impoundments can result in variable water levels causing a drawdown	The landscape and visual team have been involved in the location, siting and design of the Proposed Development to minimise effects. **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report**) sets out the Landscape and Visual Impact Assessment (LVIA) with the anticipated effects on landscape and visual receptors arising from the development and whether such effects are considered to be significant or not. Citations for relevant SLAs are included within **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)** and inform the assessment of effects. This includes Loch Ness and Duntelchair SLA. The LVIA conforms to relevant guidance including Guidelines on Landscape and Visual Impact Assessment (GLVIA3) (Landscape Institute, August 2024) and Technical Guidance (TGN) 06/19 'Visual Representation of development proposals' (Landscape Institute, September 2019) Visualisations will be provided to both The Highland Council and NatureScot specifications. The LVIA assesses the impact of all parts of the Proposed Development set out with **Chapter 2: Project and Site** Description

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
				scar which is likely to have increased visibility from a distance, creating a new visual focus in the landscape. Impacts can arise from the direct visual effect of this new feature, or from the perceived effects on wild land quality. Assessment of the landscape and visual impact of the likely drawdown maximum and minimum levels (natural and managed) and the duration of the maximum and minimum levels and the timing (season) should be considered. Suitable visualisations should include visuals for when the scheme is complete, and the landscaping matured and for interim periods throughout construction and establishment of the landscaping to consider the worst-case scenario. Additional viewpoints are requested, and details of these and further information regarding all of the above can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	(Volume 2: EIA Main Report) on landscape and visual receptors. A review of the Wind Turbine Map and the HydroMap was used to inform the scope of the cumulative assessment
29	The Highland Council, SEPA	19th October 2024	Pre-Application Advice	SEPA was consulted during pre-application engagement. Within the pre-application response SEPA had no further site-specific comments to those provided in the Scoping Opinion.	Please see ID 55 - 61 of this Consultation Tracker to see SEPA's full Scoping Opinion and the Applicant's Scoping Response.
30	The Highland Council	19th October 2024	Pre-Application Advice	Whilst no further comments were received from The Highland Council's Ecology the following guide gives an overview of their likely requirements. A full assessment of the ecology of the site and a suitable buffer around the site needs to be undertaken to determine if there are any ecological/environmental constraints associated with the proposed development. Details of what the assessment should include and specific guidance regarding the surveys and policies can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The proposed development will need to accord with the policies of NPF4 including Policy 3, which requires that all developments must deliver not just ecological mitigation and compensation but also biodiversity enhancement of the site. As this is a Major development, Policy 3b is applicable to this development. In order to satisfy Policy 3b a Biodiversity Enhancement and Management Plan that details how criteria i to v will be met, will be required in addition to the EIA/EcIA. It must also detail that the development will accord with Policies 57-60 of the HwLDP. The Biodiversity Enhancement and Management Plan will be carried out by a suitably qualified and experienced consultant and will include a Biodiversity Net Gain Metric (BNG) and demonstrate a minimum of a 10% increase of the biodiversity of the site post construction. In rare cases where site constraints result in the applicant being unable to deliver one or more of the above criteria, consideration may be given to developer contributions as to enable biodiversity enhancements to be implemented elsewhere in line with the mitigation hierarchy to allow offset, off-site measures.	**Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)** and **Chapter 8: Aquatic & Marine Ecology (Volume 2: EIA Main Report)** addresses all stated points. Proposed biodiversity enhancement and compensation measures are detailed in the **oLEMP (Appendix 6.4 Outline Landscape and Ecology Management Plan (Volume 5: Appendices))**; Biodiversity Net Gain calculations are reported in the **oLEMP**. Note that blanket bog is regarded as 'irreplaceable' in BNG metrics, and is instead addressed under the NatureScot lost: restored + enhancement ration of 1:10 + 10%, carried out by on-site and (mainly) off-site restoration;
31	The Highland Council	19th October 2024	Pre-Application Advice	The Design Quality and Place Making policy (Policy 29) in the HwLDP requires new developments to positively contribute to the area's architectural and visual quality. Development proposals must respect the local landscape, architecture, design, and layout. Careful attention should be given to track alignment, finish, and the groundworks for all infrastructure. Clear plans detailing the phasing of works, including exploratory, enabling, and final construction works, are needed.	Landscape has influenced the design from any early stage. The details on Landscape can be seen in **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)**.

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				NatureScot highlights that grid connections and spoil from tunnel operations in similar schemes can lead to significant impacts. They advise that the grid connection and spoil management be fully detailed in any future application, along with clear information on work phasing, including road improvements. Visibility of Loch ness from the A82 is often limited, applicants should explore whether there is any scope for strategic opening up of views to the loch in the vicinity of their shore works, where this would not adversely affect slope stability or integrity of existing habitats etc. The Design and Access Statement should outline the design principles and concepts that have been applied to the development and details on what should include the design policies or approaches adopted and taken into account, the steps taken to appraise and include in the design the context of the development, any consultation has been undertaken, and how consultation outcomes have been incorporated. Further advice on the preparation of design statements is contained in the Council's advice note on Design and Access Statements and Scottish Government Planning Advice Note 68.	Regarding THC's suggestion to open up views of the Loch near the shore works it was considered that there were limited opportunities to open up the loch shore due to the effects on existing habitats notably the AWI woodland by the loch shore.
32	The Highland Council	19th October 2024	Pre-Application Advice	The Highland Council's Environmental Health Team have no additional comments beyond their consultation response to 24/02045/SCOP. See THC Environmental Health Officer's Scoping Opinion in the Consultation Tracker at ID 11.	See THC Environmental Health Officer's Scoping Opinion and the Applicant's Response in the Consultation Tracker at ID
33	The Highland Council	19th October 2024	Pre-Application Advice	The Highland Council's Contaminated Land Team have reviewed their database, historical Ordnance Survey maps and aerial photos and here does not appear to be a potential source of contamination on site. Therefore, further information is not required to support the application.	N/A
34	The Highland Council	19th October 2024	Pre-Application Advice	Having reviewed the information provided, the Transport Planning Team believe that their comments previously provided for the EIA Scoping (24/02045/SCOP) are still relevant and should be followed in support of any application made for planning permission. Options for access to the site are identified as being the A82(T) via Grotaig, the A82(T) via Alltsigh or A831 via Balnain. A Construction Traffic Management Plan will be prepared in consultation with Transport Scotland, THC, Police Scotland and other stakeholders. In addition, AIL assessment, condition surveys and traffic management will be provided. Forecast HGV movements using any trunk road junctions should be explicitly identified, with the impact of both general construction traffic and abnormal loads being quantified and mitigated as appropriate. The thresholds as indicated within the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023) should be used as a screening process for a transport assessment. This should determine whether there are likely to be any significant environmental issues associated with increased traffic on the trunk road network, and any requirement for further trunk road assessment. The study area for the assessment should encompass both the AIL route and the proposed routes for construction traffic. The Headpond will utilise the existing Loch nam Breac Dearga with the tailpond within Loch Ness, abstracting and discharging water from and to Loch Ness. This results in the need to cross the A82(T), and any proposed changes to the trunk road network must be discussed and approved.	**Chapter 14: Access, Traffic & Transport (Volume 2: EIA Main Report)** addresses all stated points.

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35	The Highland Council	19th October 2024	Pre-Application Advice	DMRB may be suitable for assessing a transport project's impact on public access and active travel, particularly for the roads elements of the proposal. However, NatureScot's Handbook on Environmental Impact Assessment should be used to evaluate the broader impact on public access. In addition, the applicant must adequately assess established and new patterns of public access across the site. A comprehensive assessment of the impacts and their mitigation should form the basis on an Outdoor Access Plan, a draft of which should be submitted with an application in line with Policy 77 of the Highland wide Local Development Plan. That assessment will include the Affric Kintail Way, Great Glen Way and Great Glen Canoe Trail; long distance routes covered by Policy 78 in that same plan. Since recorded public rights of way are likely to be affected the Countryside (Scotland) Act 1967 should also be included in any list of relevant legislation.	**Chapter 16: Socio-Economics, Tourism and Recreation (Volume 2: EIA Main Report)** covers all the stated points.
36	The Highland Council	19th October 2024	Pre-Application Advice	There are a number of watercourses present within, or adjacent to, the application site boundary. This type of development is considered both 'Essential Infrastructure' and 'Water Compatible' under SEPA's 'Flood Risk and Land Use Vulnerability Guidance'. The development can therefore be located in areas at risk of flooding as long as it is designed to remain operational (i.e. will not be adversely affected) during flood events and does not increase flood risk to others. A Flood Risk Assessment should be submitted to demonstrate that the development will remain operational during flood events and will not increase flood risk elsewhere. A key element of the FRA will be an assessment of the flood risk impacts of the scheme when in operation, both on its own and in combination with other hydroelectric schemes, existing and proposed, that feed into Loch Ness. It is likely that a 'stop generating/curtailment' Loch Level will be required to ensure that flood risk is not increased downstream. Additionally, development or land raising within any flood plain should be avoided and proposals should generally follow SEPA's Standing Advice for Flood Risk. Any new small watercourse crossings for access tracks should be oversized and larger scale watercourse crossings should be demonstrated to be adequately designed to accommodate the 1 in 200-year flow (including an allowance for climate change and freeboard) to avoid increasing the risk of flooding, or information provided to justify smaller structures. A minimum buffer strip of 50m should be kept free from development from the top of bank(s) of any watercourse or waterbody. Storage of materials within this area during construction is not permitted. A Drainage Impact Assessment (DIA) for the development is required. The DIA should include details relating to any existing drainage and the management of surface water drainage, which should be designed in line with general Sustainable Drainage Systems (SuDS) principles. The Applicant should demonstrate any mitigation measures to manage the residual risk of overland flow/pluvial flooding. Natural flood management techniques should also be applied to reduce the rate of runoff where possible. Tracks should not act as preferential pathways for runoff and efforts should be made to retain the existing drainage network. Appropriate drainage is required to restrict runoff to pre-development rates and to minimise erosion to existing watercourses. The DIA should ensure that post development runoff rate is no	**Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)** provides details on all advice from the Flood Risk Management Team on Flood Risk, Water and Drainage.

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				greater than pre-development runoff rate (i.e. greenfield runoff) for a range of return periods (e.g. 2, 30 and 200 year) up to the 1 in 200-year event including an allowance for climate change. Runoff from all events up to and including the 1 in 200 year plus climate change event should be managed within the site boundary, with no flooding to critical roads or buildings, and evidence as to how this will be achieved should be included within the DIA. Further advice is provided in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	
37	The Council Highland	19th October 2024	Pre-Application Advice	Within the pre-application response HES had no further site-specific comments to those provided in the Scoping Opinion. Please see HES's Scoping Opinion and the Applicant's response at ID 72 of this Consultation Tracker.	The Applicant's response can be seen at ID 66 of this Consultation Tracker.
38	The Council Highland	19th October 2024	Pre-Application Advice	The Council's Developer Contributions Supplementary Guidance will be used in the determination of planning applications and requires all development make proportionate financial developer contributions towards meeting service and infrastructure needs in areas of Highland where clear deficiencies are identified. The anticipated developer contribution requirements are outlined below. Industrial (including energy) developments are exempt from education, community facilities and affordable housing contributions. However, contributions towards Transport (including Active Travel), Green Infrastructure, Water & Waste and Public Art/Realm contributions in compliance with NPF4 Policy 18 (Infrastructure first), HwLDP Policy 31 (Developer Contributions) and Developer Contributions Supplementary Guidance (2018) may be required. THC wants to make sure that local communities benefit directly from the use of their local resources and are compensated for the disruption and inconvenience associated with large scale development work. The Council's Social Values Charter for Renewables Investment sets out a 9-point plan articulating the expectations of the Highland area for any renewables and green energy developments and should be used alongside THC's Community Benefit policy. National developments should be exemplars of the community wealth building approach to economic development. The intent of NPF4 Policy 25: Community Wealth Building is to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels. NPF4 Policy 25 supports proposals that contribute to local or regional community wealth building strategies, are consistent with local economic priorities, and are linked to community ownership and management of land, THC's draft Community Wealth Building Strategy 2024-2027 was approved for wider consultation and has now been developed which sets out a 3-year vision. This should be consulted. A Local Place Plan is a community-led document that aims to easily convey a community's proposals for the development or use of land and buildings in their local area. Some community bodies have prepared or are preparing Local Place Plans for, or in the vicinity of, the area in which the proposed site is located. Local	The applicant is committed to delivering community benefits and is actively engaging with stakeholders, including THC, to develop a tailored Community Benefit Package.

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				Place Plans will be taken into account in preparing the Local Development Plan and can be a material consideration when planning applications are being considered by our Planning Authority.	
39	The Highland Council	19th October 2024	Pre-Application Advice	All other comments concerned application and pre-application procedures.	N/A
40	THC (Environmental Health Officer)	19th June 2024	Scoping Opinion	Response where the Environmental Health Officer response was collated into the body of the main response with reference ID 11 of this Consultation Tracker.	The Applicant's response can be viewed in relation to THC main response.
41	THC (Environmental Health Officer)	9th September 2024	Email	NSR1, NSR3, NSR4, NSR5, and NSR6 are suitable to represent the locations specified. Potential geographical gap at Dhivach, confirmation is required on the NSR location used as proxy. Suggestion of another location around 249354, 825195 – Ancarraig House or thereabouts. A week is recommended for long term unattended monitoring, with scope to reduce to 4 days if it can be demonstrated that background levels are fairly stable.	The information provided by the EHO informed the approach to noise monitoring. Further details on the methodology of noise monitoring are detailed in **Chapter 12: Noise & Vibration (Volume 2: EIA Main Report)**.
42	THC (Environmental Health Officer)	16th September 2024	Email	My scoping response included our preferred noise targets, and the hours of operation are usually much more important to residents than absolute levels. It is likely that monitoring will identify the majority of properties as falling within Category A. With regard to operational noise, hopefully predicted noise levels will be so low as to be inaudible at noise sensitive receptors. However, where this may not be the case, our Service will need to be satisfied that the noise will not result in an adverse impact especially given the fact that the development will be operational 24/7 every day. The ideal scenario is to obtain enough data to be satisfied that the measured levels are representative of the background noise levels at each NSR across different time periods. The concern is that with short term measurements it can be difficult to demonstrate that. Where security allows, equipment will be left for longer periods and that longer measurements will be undertaken where it is evident that background levels fluctuate, and these locations are still to be finalised. Ideally this will be at one of the NSRs where operational noise may be a consideration. The difficulties if the residents aren't responding are appreciated. If the survey has to be restricted to short term attended measurements, it is likely that we would look to take a conservative approach and adopt the lowest levels from the survey rather than any form of average. If limited to short term attended monitoring, this should be done over two distinct periods, undertaken several days, if not weeks, apart which would give further confidence to the measured results. A single 1hr daytime or 30min nighttime measurement is unlikely to be sufficient. It is suggested that more focus can be given to potential operational noise receptors. For daytime noise, the important period is likely to be late evening. For nighttime noise it is preferred to use results between 0000 and 0500 rather than say, 2300 and 0000 or 0600 and 0700 when traffic levels might be higher.	The information provided by the EHO informed the approach to noise monitoring. Further details on the methodology of noise monitoring are detailed in **Chapter 12: Noise & Vibration (Volume 2: EIA Main Report)**.

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43	THC (Landscape Officer)	11th June 2024	Scoping Opinion	The Landscape Officer's response regarding the Landscape and Visual Impact Assessment of the proposed development can be seen in ID 22 of this Consultation Tracker.	The Applicant's response can be viewed in relation to THC main response on landscape at ID 5 of this Consultation Tracker.
44	THC (Landscape Officer)	4th November 2024	Meeting	A meeting to discuss: • Representative viewpoints – including new locations added following scoping with reference to the updated Zones of Theoretical Visibility (ZVT) and other locations requested in THC pre app response. • Design of the temporary and permanent infrastructure noting the comments raised in THC pre app response. • The requirement for construction visualisations. • Approach to mitigation design. • Sequential routes to consider the effects on both the main visual assessment and cumulative assessment, including the Loch nam Breac Dearga circular walk, Loch Ness 360 trail, Great Glen Way, Affric Kintail Way, A82 and B852.	Informs approach for **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)**.
45	THC (Transport Planning Team)	8th July 2024	Scoping Opinion	The Transport Planning Team's response can be seen in ID 30 of this Consultation Tracker.	**Chapter 13: Access, Traffic and Transport (Volume 2: EIA Main Report)** addresses all stated points.
46	THC (Archaeological Advisor)	20th August 2024	Meeting	Meeting to discuss walkover surveys and viewpoints for designated assets.	Informed survey and visualisation points for the entire report.
47	THC (Archaeological Advisor)	13th December 2024	Meeting	Meeting to discuss mitigation measures for Cultural Heritage chapter.	**Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)**
48	THC (Access and Planning Officer)	6th November 2024 and 15th January 2025	Meeting	Meeting regarding access management and potential options.	Informed decisions made for design that impacts EIA report.
49	THC (Planning Officer)	6th November and 12th December 2024; 15th and 29th January 18th February, and 4th March 2025	Meetings	Meetings to provide THC an update on progress of the EIAR, agreement decommissioning will be scoped out of assessment, Affric Kintail Realignment, preconstruction phase and workers accommodation layout and facilities. The Highland Council Planning Officer also attended key meetings with The Highland Council's Access Officer, SEPA and NatureScot.	N/A

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50	NatureScot	5th February 2024	Introductory Meeting	NatureScot provided the following feedback: • Key concern is over the River Moriston SAC regarding freshwater pearl mussels and Atlantic salmon / salmon smolts within the Loch Ness catchment. Smolts migrate from the rivers of their birth downstream through Loch Ness, however there is little existing data on their exact movements through the loch, so it is uncertain how they will react to and be affected by PSH (including existing and proposed PSH schemes). As a result, NatureScot want to see evidenced-based (i.e., through smolt tracking study) assessment to inform effective mitigation. NatureScot also requested an assessment on upstream adult salmon migration rates. • Concerns over the cumulative impact from the four PSH schemes on Loch Ness • Concerns over how smolts will be affected within the Ness Catchment in particular in the Moray Firth SAC where dolphins are known to feed on smolts in the summer months, particularly at Chanonry Point. Therefore, a need to include marine ecology assessment in the scoping report. • Concerns over Urquhart Bay Wood SAC which could be affected by changes in water levels, and so needs to be included within assessments, including cumulative effects. • Peatland – there is category 1 peatland within the site, loss of which will require off-site upland enhancement as compensation. • NatureScot enquired about the grid connection. • No concern over landscape and visual effects on the basis that no nationally designated landscapes are likely to be directly or indirectly impacted.	A HRA assessment has been performed and can be viewed in further detail in **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices).** Matters concerning terrestrial ecology such as Urquhart Bay Woods SAC and peatland restoration are addressed in **Chapter 7: Terrestrial Ecology** and matters concerning Atlantic Salmon smolts, the Moray Firth SAC and the River Moriston SAC are covered in **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report).** Other questions relating to the design and the grid connection were shared throughout the EIA process as the design progressed. The details are available in **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)**.
51	NatureScot	25th June 2024	Scoping Opinion	The proposal will not affect any nationally important landscape, and we agree with the proposed scope of the LVIA and suggested range of visualisations.	No further action required.
52	NatureScot	25th June 2024	Scoping Opinion	Urquhart Bay Woods SAC is designated for alder woodland on floodplains. Urquhart Bay Woods is one of very few intact floodplain woodlands remaining in the UK. Any changes in local and catchment hydrology could have significant effects on the site. There is potential connectivity to the SAC from the Glen Earrach scheme because its operation will result in changes to the water level regime in Loch Ness. However, it does not appear from the information provided in the Scoping Report that impacts on Urquhart Bay Wood SAC will be considered. We advise that the applicant provides sufficient information to enable an assessment of potential effects on the conservation objectives of the site and to demonstrate whether it can be ascertained that there is no Adverse Effect on Site Integrity (AESI). The assessment should include modelling water levels in Loch Ness for various scenarios of generation and pumping (abstraction) using the most realistic worst-case scenarios. This should be set against the current baseline which includes Foyers PSH and the Caledonian Canal. Additionally, the assessment should separately consider the combined effects of the proposal with other proposed development. Questions asked by the applicant in the scoping report:	The details of the terrestrial ecology assessment are in **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report).** **Appendix 7.2: Statement to Inform Habitats Regulations Appraisal** (**Volume 5: Appendices**) considers in detail the possible impacts and effects of the Proposed Development on Urquhart Bay Wood SAC, and any other European sites within the zone of influence (ZoI). Cognisance has been given to NatureScot guidance[1] on peatland, including in regard to the amount of peatland restoration required to achieve compensation (1:10 lost: restored) and enhancement.

[1] NatureScot (2023) *Advising on peatland, carbon-rich soils and priority peatland habitats in development management* (online) Available at: https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management.

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				• *Do you agree that the scope of desk study and ecological field survey described in this Section is sufficient to inform the Ecological Impact Assessment element of the EIA? Please advise if there are any further studies of surveys which you consider to be necessary*. **- We consider it unnecessary to conduct surveys of bat activity, as the development Site is likely to be of low importance to bats, and the operation of the development will have no effect on bats. We refer the applicant to our standing advice on our website; https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species** • *In the interests of identifying opportunities for the Development to deliver biodiversity enhancements, are there any suggestions that you may make as to how this may be best achieved in this case? Are you aware of any local projects to which the Development could contribute, for example?* - **We defer to The Highland Council to provide comment on biodiversity enhancement opportunities.**	The cumulative drawdown of PSH schemes was conducted through hydraulic modelling with the results presented in **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report).** The assessment of the cumulative schemes terrestrial ecology receptors is reported in **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)**. A response to the THC scoping response and pre-application advice on biodiversity enhancement can be seen in this Appendix at ID 10 and 25.
53	NatureScot	25th June 2024	Scoping Opinion	We generally agree with the scope of the aquatic ecology desk study and ecological field survey described but have the following advice for the applicant in regard to River Moriston SAC and Moray Firth SAC. The River Moriston SAC is designated for Freshwater pearl mussel (FWPM) and Atlantic salmon. Atlantic salmon are also a critical component of FWPM life cycle as host fish. Therefore, impacts on salmon will also have indirect impacts on FWPM and this link needs to be considered in any assessment. Freshwater mussel populations are vulnerable to changes to water quality (including pollution), hydrological alterations, habitat degradation of riverbeds and banks, illegal pearl fishing and availability of host species. As Atlantic salmon migrate up and down stream, any barriers to fish passage on any part of their route, could have significant negative effects. Facilitating the access of Atlantic salmon to all areas of the catchment (including outside the boundary of the SAC) where they could expect to occur naturally is a key objective of the site. Both qualifying interests are currently in 'unfavourable' condition, with Atlantic salmon known to face significant mortalities both at sea, and during downstream migration including in Loch Ness. At this stage we advise there is a risk that the impacts of this proposal will not allow the conservation objectives for the features of River Moriston SAC to be met. We advise that the applicant provide sufficient information to assess the effects from all possible impact pathways which should also be used to inform the assessment of impacts on FWPM. These pathways are detailed in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** We advise that the applicant provides sufficient information to enable an assessment of potential effects of all impact pathways, including any not listed, on the conservation objectives of both qualifying interests and to demonstrate whether it can be ascertained that there will be no AESI. Assessments should be based on realistic worse case scenarios and include the effects of the scheme (a) alone in the context of the current baseline which includes Foyers PSH and the Caledonian Canal, and, separately, (b) in combination with	A detailed assessment of the potential impacts and effects of the Proposed Development on the River Moriston SAC and Moray Firth SAC is included within **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices)** and within **Chapter 9 Aquatic & Marine Ecology (Volume 2: EIA Main Report).** It has been noted that NatureScot, as a consultee, was available to provide comments on draft proposals for the habitat regulations assessment and any related surveys, modelling and assessment. **Chapter 9 Aquatic and Marine Ecology (Volume 2: EIA Main Report)** will be informed by a study consisting of a detailed literature review and existing data on salmon smolts. A further salmon smolt study will be undertaken post- submission to evaluate the EIAR assessment and additionally inform the detailed mitigation measures. The salmon smolt study scope has been developed with consultation from NatureScot, NDSFB and THC.

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				other proposed developments. Any mitigation measures proposed should also be assessed against the conservation objectives. We would be happy to advise on draft proposals for the surveys, modelling and assessment approaches that will be required, and also on a draft shadow Habitats Regulations Appraisal (HRA) for the River Moriston SAC prior to submission. As little is known about how smolts move within Loch Ness, or key locations and causes of mortality, surveys of the movement of smolts from the River Moriston SAC through Loch Ness may be required. We consider that this proposal has potential to adversely affect the integrity of the River Moriston SAC. If so, the ECU needs to consider whether the tests in Regulations 49 and 53 of the Habitats Regulations can be met. NatureScot has no statutory role in advising on whether these further tests are met.	
54	NatureScot	25th June 2024	Scoping Opinion	Continued from above comment. In the Moray Firth, bottlenose dolphin presence in the summer months coincides with the seasonal migrations of salmonids. Chanonry Point, downstream from the mouth of the River Ness, is a well-known and monitored foraging area for bottlenose dolphin. Here there have been visual observations of foraging (mainly on salmon) and also passive acoustic monitoring which has recorded foraging buzzes and 'brays'. The development therefore has the potential to impact on the bottlenose dolphin feature through impacts on the numbers of migrating and returning salmon in the Ness catchment. Any assessment should consider the same impact pathways for Atlantic salmon as discussed above, given the importance of Atlantic salmon to the bottle-nosed dolphin qualifying interest of the Moray Firth SAC. We will be happy to comment on the applicant's draft HRA for Moray Firth SAC, prior to submission. It is advised that any mitigation, particularly if it includes raising water levels in Loch Ness will need to consider wider and additional impacts on designated sites such as Urquhart Bay Woods and Ness Woods SAC.	A detailed assessment of the potential impacts and effects of the Proposed Development on the River Moriston SAC and Moray Firth SAC is included within **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices)** and within **Chapter 9 Aquatic & Marine Ecology (Volume 2: EIA Main Report).**
55	NatureScot	25th June 2024	Scoping Opinion	The development will be located around 4km from North Inverness Lochs Special Protection Area (SPA), selected for Slavonian Grebe. We will be happy to comment on the applicants draft HRA for the SPA, prior to submission. Questions asked by the applicant in the Scoping report – • *Do you agree that the scope of desk study and ecological field survey described in this Section is sufficient to inform the Ecological Impact Assessment element of the EIA? Please advise if there are any further studies of surveys which you consider to be necessary*. **– We agree that the desk study and ecological field study should be sufficient. However, please note we have recently become aware that Slavonian grebe is nesting in other non-designated lochs across the area, and we have also recently become aware that Golden Eagle may be nesting on crags near to the proposed upper reservoir.** • *Please confirm that you agree that ornithological survey covering one year will be sufficient to inform the EcIA, and that two years of bird survey will not be necessary*. **- Although we agree that a survey**	Survey for breeding Slavonian grebe was carried out at all potentially suitable waterbodies within 2 km of the Proposed Development, and not just at those which are designated for this species. Consideration of the potential impacts of the Proposed Development on this species is given in **Chapter 8: Ornithology (Volume 2: EIA Main Report)** and, in relation to SPAs, in **Appendix 7.2: Statement to Inform Habitats Regulations Appraisal (Volume 5: Appendices)**. Survey for breeding golden eagle was carried out in all areas of suitable habitat

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				covering one year may be sufficient, it will depend on the results, which we will be happy to advise on. Therefore, the applicant should schedule enough time into the survey programme to allow for a second year of surveys, should they be required. • *Are you aware of any other sources of data on bird species that may be helpful to our assessment and which we may be able to access?* **– Please contact us directly to discuss** • *In the interests of identifying opportunities for the Development to deliver biodiversity enhancements, are there any suggestions that you may make as to how this may be best achieved in this case? Are you aware of any local projects to which the Development could contribute, for example?* **– we defer to The Highland Council to provide comment on biodiversity enhancement opportunities.**	within 6 km of the Proposed Development. Furthermore, data on known and historic breeding locations were obtained from the Highland Raptor Study Group (RSG), and the estate manager was consulted for their own knowledge of golden eagle presence.
56	NatureScot	25th June 2024	Scoping Opinion	We know from other schemes of this nature that spoil from tunnel operations can have the potential to raise further impacts. Therefore, we advise that detail of spoil management is fully detailed in any application going forward. We advise that the applicant follows our detailed guidance on peatland, carbon-rich soils and priority peatland habitats. We will be happy to comment on any Peatland Restoration Plan if required.	This is considered within the **Materials Management Appraisal (Volume 5: Appendices)** and the **Peat Management Plan (Volume 5: Appendices)**. It was noted that NatureScot, as a consultee, was available to provide comments on the above plans.
57	NatureScot	25th June 2024	Scoping Opinion	We advise that a schedule of mitigation is provided which clearly details all measures required to minimise the impacts of the scheme. And which considers potential impacts the mitigation measures may also cause other designated sites and species.	**Appendix 19.1 Mitigation Register (Volume 5: Appendices)** provides a schedule of mitigation measures.
58	NatureScot	19th September and 12th November 2024; 9th January 18th February and 4th March 2025	Meeting	Meetings and email chain to discuss the Proposed Development, approach to the terrestrial and aquatic ecology assessments.	Informed assessments in **Chapter 7: Terrestrial Ecology** and **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report).**
59	NatureScot	18th December 2024	Comments on Smolt Tracking Study scope via email	The proposal benefits from the previous studies on smolt migration carried out by the Atlantic Salmon Trust. Overall, the tagging approach is technically sound – the sample size (200 tagged smolts) is reasonable. We would prefer if all these fish originated from the Moriston itself, rather than from the rivers Oich and Garry as this would tell us more about the SAC. As currently proposed the sample size from the Moriston will be smaller than 200 and this may mean the sample size is too small to adequately assess impacts on the SAC. There is some confusion as to what will happen once the fish are tagged. Section 3.9 suggests that fish will be transported downstream from the capture site to Loch ness, but Section 3.11 states that the fish will be "released downstream of the capture sites in the rivers they were caught". We advise that the fish are	The consultation with NatureScot informed the approach and methodology to be used within the Smolt Tracking Study. Further details including all consultation regarding smolt tracking can be seen in **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report).**

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				released in their original rivers so that we can correctly assess what direction they take upon exit. If the fish are to be released in the rivers, can you clarify where they will be released and ensure that the locations avoid being too far upstream to avoid in river losses on release. While we agree with the placement of the receivers generally, we advise the following: 1. If fish are to be released in the rivers themselves, we would like to see a receiver located at the mouth of each of the rivers where smolts are being tagged – so that we can be sure how many tagged fish exit the rivers into Loch Ness. To assess that these fish are alive and actively migrating, we would consider more than one in-river receiver at each location to mitigate against receiver loss/failure and to provide data confidence. 2. An array located to the south of the mouth of the Moriston should be considered so that we can get an understanding of how many fish from the Moriston migrate towards the River Oich rather than towards the Ness. An array in this location may also lead to other information, such as how long the fish spend in the area. Sections 3.6-11 provide no detail regarding the timing of smolt captures (will fish be released throughout the smolt migration period?) and the mechanics of release (how will tagged fish be kept in recovery, what time of day will they be released – day/night) etc. We note that this survey appears to be for one year only. We advise that this should be carried out beyond one year to be confident in results (wind conditions can be different between years for example and this may affect internal surface currents).	
60	NatureScot	28th January 2025	Gate Check Response	Generally, based on the submitted Gate Check Report, we are mostly content that the developer has considered the advice we have previously provided on the scope of the EIA. However, we have the following comments: The gate check report states (Page 11 – Water Levels) 'The EIAR should also address how the lower water levels in Loch Ness and subsequently on the mouth of the River Moriston while the scheme is abstracting water and the impacts on Fresh Water Pearl Mussels. NatureScot also noted the need to understand the implications of mitigation such as raising water levels on Urquhart Bay Woods SAC and the Ness Woods SAC' Whilst we agree that the assessment on water levels consider impacts on FWPM both directly and indirectly, as well as considering potential cumulative impacts on the Urquhart Bay Woods SAC and Ness Woods SAC, we remind the applicant that we advised that water level assessments were also carried out to enable assessments on impacts on salmon in the wider environment. For clarity in our scoping response, we advised the following:	The water level assessments have informed the assessments on impacts to Atlantic Salmon within the wider environment. The details can be seen in **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)** and **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices)** contain the full details of the impact assessments on the qualifying interests on the SACs using the realistic worst-case scenarios of the cumulative developments.

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				'We advise that the applicant provide sufficient information to assess the effects from all possible impact pathways including: • Lower water levels in Loch Ness and subsequently in the mouth of River Moriston while the scheme is abstracting water, which may impact FWPM populations in the mouth of the river. • Reduction of water levels in Loch Ness impeding downstream smolt migration We advise that the applicant provides sufficient information to enable an assessment of potential effects of all impact pathways, on the conservation objectives of both qualifying interests and to demonstrate whether it can be ascertained that there will be no AESI. Assessments should be based on realistic worse case scenarios and include the effects of the scheme (a) alone in the context of the current baseline which includes Foyers PSH and the Caledonian Canal, and, separately, (b) in combination with other proposed developments, including Red John and Kemp pump storage hydro schemes. Any mitigation measures proposed should also be assessed against the conservation objectives. We would be happy to advise on draft proposals for the surveys, modelling and assessment approaches that will be required, and on a draft shadow Habitats Regulations Appraisal (HRA) for the River Moriston SAC prior to submission. As little is known about how smolts move within Loch Ness, or key locations and causes of mortality, surveys of the movement of smolts from the River Moriston SAC through Loch Ness may be required. It is advised that the applicant follows our detailed guidance on peatland, carbon-rich soils and priority peatland habitats. They should ensure that this is included in the final EIAR. At this stage we note that there is no opportunity to comment on the quality of the work undertaken or the findings of studies undertaken. Therefore, please note that our advice is given without prejudice to a full and detailed consideration of the impacts of the proposal if it is submitted for formal consultation as part of the EIA or planning process	The guidance on peatland, carbon-rich soils and priority peatland habitats have been acknowledged within **Chapter 7: Terrestrial Ecology** and **Chapter 15: Geology and Ground Conditions (Volume 2: EIA Main Report)**.
61	SEPA	5th July 2024	Scoping Opinion	Site specific pre-application and scoping advice: For a development of this scale, it is especially important to ensure that detailed layout plans submitted at the application stage are provided for all elements of the development. The plans submitted with the application must detail all the temporary or ancillary works such as laydown areas, rock and peat storage areas and site compounds, which we presume will be extensive for a development of this size. They should show the area of site effected by the development (i.e. including cut and fill), not just the final footprint. The application submission should also include plans which show above and below ground infrastructure separately. The final layout should make as much use as possible of existing infrastructure such as existing tracks and minimise the length of new tracks needed to facilitate the development. If there are other proposed developments in the vicinity support facilities could be shared.	Layout plans detail all requested elements of the Proposed Development. The full details of the Proposed Development can be found in **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)** and **Volume 3: Figures** contains the full list of figures to be referred to. Existing access tracks have been integrated into the design where possible. **Appendix 16.1 Outline Access Management Plan (Volume 5: Appendices)** sets out how the final layout makes as much use as possible of existing tracks.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
62	SEPA	5th July 2024	Scoping Opinion	In relation to section 2 of the attached Appendix (CAR requirements) and section 3 of the scoping report there is a need to fully assess the potential cumulative impacts on Loch Ness. Discussions direct with our Water Permitting team will reveal what other elements of assessment are likely to be of most significant.	The cumulative impacts on Loch Ness are assessed within the relevant chapters of **Volume 2: EIA Main Report**.
63	SEPA	5th July 2024	Scoping Opinion	In relation to peat: • We can confirm that a Peat Management Plan will be required for this development. Ensure that suitable probing information is collected to inform the layout. • Disturbance of peat should be minimised, and the final submission should include a plan showing the extent of disturbed area. The area of peatland disturbed (including due in maximum inundation and the effects of inundation due to erosion on the surrounding peat) should be confirmed. Information should be provided on how areas of disturbed and undisturbed peat within the inundation area will be managed so that carbon loss is reduced. • Note the requirement for information on peatland condition. • Please also note we are streamlining our approach to consultations concerning peat and carbon rich soils. We will focus our planning advice on the avoidance, minimisation, and use of peat in areas disturbed by construction activities. We will no longer provide advice on peatland restoration. Developers should refer to NatureScot guidance on restoration.	**Appendix 15.2 Outline Peat Management Plan (oPMP) (Volume 5: Appendices)** is attached an appendix to **Chapter 15: Geology and Ground Conditions**. The oPMP has been prepared with the input from the landscape and Ecology team and contains details of probing used to inform the layout of the Proposed Development, whether the Proposed Development results in the disturbance of any peat, inundation, as well as any potential impacts on peat condition. Details of the embedded and additional mitigation measures identified to minimise impacts on peat are set out in **Chapter 15: Geology and Ground Conditions (Volume 2: EIA Main Report)** and **Appendix 19.1 Mitigation Register (Volume 5: Appendices)**. The baseline conditions and assessment of impacts on peatland are provided in **Chapter 15: Geology and Ground Conditions** and **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report).**
64	SEPA	5th July 2024	Scoping Opinion	<u>Materials Management</u> In relation to section 2 of the scoping report and rock and overburden excavation generally: We welcome the proposal for a Materials Management Appraisal. This should include information in relation to the type and volumes of material that will be excavated on site accompanied by clear information on temporary storage (which is likely to require an extensive area), reuse on site and use or disposal elsewhere. Any material that cannot be appropriately used within the site works will be considered waste and waste management legislation would apply. Any storage of material for more than three years is a landfill and will require a PPC Part A Permit. In view of the extensive volume of excavated material being produced we do not expect the development to include additional borrow pits unless it is subsequently demonstrated that there is a clear need for additional material.	**Appendix 15.1 Material Management Appraisal (Volume 5: Appendices)** details the MMA undertaken as part of the EIA process to ensure that the material that is generated from construction is classified and reused as far as practically possible. The borrow pits required are detailed in **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)**.

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65	SEPA	5th July 2024	Scoping Opinion	In relation to forest waste in addition ensure that any new planting proposals are in line with Briefing Note 18: Publication of GWDTE Practice Guide.	**Chapter 18: Forestry (Volume 2: EIA Main Report)** details the approach taken in relation to forestry and forest waste.
66	SEPA	5th July 2024	Scoping Opinion	In relation to pollution, we can confirm that from our perspective an outline Construction Environmental Management Plan (CEMP) need not be provided with the application. This is on the understanding that (1) the proposed Materials Management Appraisal will address all aspects of spoil management (minimisation, handling, processing, reuse on site, reuse off site and if required disposal) and any related waste management, (2) peat management is covered by a Peat Management Plan, (3) detailed site plans are submitted which demonstrate how impacts on the environment have been minimised through design and (4) all mitigation is detailed within a suitably robust schedule of mitigation. This approach will hopefully help streamline the overall information and assessment requirements.	Although SEPA's response clarifies that a CEMP need not be prepared a CEMP has been prepared to ensure there is a single document where all documentation will be linked and in line with other guidance. The outline CEMP can be found in **Appendix 3.1 Outline Construction Environmental Management Plan (Volume 5: Appendices)**. This will ensure that the full range of environmental considerations are included.
67	SEPA	5th July 2024	Scoping Opinion	Details of general regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the regulations section of our website. Pre-application CAR discussions should be instigated with SEPA as soon as possible via Waterpermitting@sepa.org.uk. Please also see our website for further information about the Reservoirs Act 2011. If you have queries relating to this letter, please contact planning.north@sepa.org.uk including our reference number in the email subject.	The information provided has been noted. Discussions regarding the CAR licence have been ongoing since the Scoping Opinion.
68	SEPA and NatureScot	19th September 2024	Meeting	This meeting took place post-scoping. The topics discussed included: • The Applicant outlined the intention to submit a CAR licence. • The Water Environment Assessment, including private water supply studies, identification of GWDTEs and the need for further consultation on the design principles for water crossings and the water quality assessments. – SEPA's feedback was that the focus for water crossing should be on major crossings and then standard details provided for small water crossings • Discussed the status at the time of peat probing – SEPA requested that both the quantity and quality of peat is assessed.	Ongoing consultation with SEPA has informed the approach to the EIA for a range of topics including **Chapter 10: Water Environment**, **Chapter 11: Flood Risk & Water Resources** and **Chapter 15: Geology and Ground Conditions (Volume 2: EIA Main Report)** as well as informing the approach to applying for the CAR licence.
69	SEPA	21st October 2024	Meeting	Consultation was held with SEPA ahead of the Phase 2 peatland survey, with the following key points raised by SEPA: • Probing along existing access track may be required if widening proposed. • Preference for detailed probing along the main access track rather than a blanket 100 m x 100 m grid in areas that were missed during the Phase 1 survey. • Check probing in areas where deeper peat was encountered.	Informs approach to peat management for **Chapter 15: Geology and Soils (Volume 2: EIA Main Report)**

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70	SEPA	4th November 2024 and 9th January 2025	Meetings	Meetings to discuss the completed Phase 2 peatland survey and specific comments raised by ESPA regarding disturbance of peat due to fluctuating water levels.	Informs approach to peat management for **Chapter 15: Geology and Soils (Volume 2: EIA Main Report)**
71	SEPA	5th February 2025	Post-Gate Check Consultation	Meeting to discuss matters raised in the Gate Check. Most of the discussion related to compensation/restoration calculations of peatland and peat habitat.	**Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)** and **Chapter 15: Geology & Ground Conditions (Volume 2: EIA Main Report)** discuss the assessment on peat habitat and peatland.
72	SEPA and NatureScot	18th February 2025	Meeting	Meeting to discuss the Dochfour Weir mitigation to control levels and flows within Loch Ness and the River Ness, and consents in loch for deployment equipment.	Informed the approach within **Chapter 7: Terrestrial Ecology, Chapter 9 Aquatic & Marine Ecology** and **Chapter 11 Flood Risk and Water Resources (Volume 2: Main Report**)
73	SEPA	4th March 2025	Meeting	Meeting to discuss CAR licence application including impoundment and abstraction licences, and water levels.	N/A
74	HES	6th May 2024	Scoping Opinion	We have reviewed the details covering world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs). THC's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings. Cultural heritage issues are acknowledged in Chapter 12, with a cultural heritage assessment to be included in the EIA. The Rochdale Envelope approach will be used to identify maximum worst-case parameters for structures, allowing flexibility to address uncertainty. The final dimensions of the components will be detailed in the EIA Report. Further advice on the assessment scope can be provided as the design progresses. We do not agree with the applicant's proposal to scope out the potential physical impacts on all the designated assets within our remit. While we can confirm that there are no category A-listed buildings, inventory battlefields, gardens and designed landscapes or world heritage sites within the boundary of the proposed development, we note that a scheduled monument, Dun Scriben, fort (SM6220), falls within the red line boundary, with the proposed improvements to an existing access track locating c. 100m to the east. Further details are required regarding the potential creation of this access track and the potential for direct and/or indirect physical impacts to arise from its formation on this scheduled monument.	Prior to the receipt of the Scoping Opinion and post-scoping the Applicant has an ongoing engagement with HES to agree the methodology and scope of the Cultural Heritage assessment. **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)** details the assessment of heritage assets and any potential impacts.

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				Significant further consideration will also be required in order to determine the likely extent of indirect physical impacts on Cherry Island crannog, Inchnacardoch Bay, Loch Ness (SM9762) and Urquhart Castle (SM90309) from the potential fluctuation in water levels in Loch Ness caused by the proposed development. The potential temporary impacts on the setting of designated assets during construction and the potential permanent impacts from new above-ground infrastructure are scoped in. The 3km study area is deemed sufficient for assessing setting impacts on designated assets, with consideration of assets beyond this distance where their setting extends into the 3km area. From the information currently available, the proposed development has the potential to adversely impact the settings of Dun Scriben, fort (SM6220) and Dun Deardail, Forts 410m and 520m ENE of Fasnagruig (SM11884). However, we consider that a bare-earth Zone of Theoretical Visibility (ZTV) taking into account all built elements of the proposed development should be produced. The list of assets highlighted above is therefore not considered to be exhaustive. It is possible that once a ZTV which covers all elements of the proposed development has been prepared by the applicant, additional assets in our remit may fall within the ZTV. Our detailed comments are in the Annex to this letter. We welcome that the applicant has referred to our Managing Change in the Historic Environment: Setting guidance note for assessments of impacts on setting of historic environment assets. We would also recommend that the undertaking of a cultural heritage assessment should reflect the best practice guidance given in the EIA Handbook, which has included an appendix on Cultural Heritage Impact Assessment. We notice that Table 12.2 has identified the different magnitudes of changes to the setting of the heritage asset, affecting the significance and resulting in changes in the ability to understand and appreciate the value of the asset. We consider that setting change includes not only our ability to understand and appreciate, but also our ability to experience the asset. We note that the applicant has proposed to scope in the potential temporary impacts on the setting of designated assets resulting from construction, and the potential permanent impacts from the development on the setting of assets due to the introduction of new above ground infrastructure (Section 12.6 refers), but scope out physical impacts on designated assets (Section 12.4.5 refers). We note that the proposed improvements to an existing access track under one of the three options are located c. 100m to the east of Dun Scriben, fort (SM6220), with a running width of 10m maximum. From Table 2.2 we understand that the proposed site access will have a running width of 10m at maximum. Further details regarding the construction and impacts on the schedule monument are required. We notice that the scoping report has not discussed indirect physical impacts clearly. As detailed in the cultural heritage appendix of the EIA Handbook (page 182), indirect physical impacts occur where the fabric is lost or preserved as a result of the proposal even though the asset lies at a remove from the proposal. An	

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example is the degradation of waterlogged deposits as a result of dewatering and changes in currents resulting in increased/decreased erosion. We do not agree that potential indirect physical impacts on all designated assets within our remit should be scoped out, until the potential impacts on two scheduled monuments, Cherry Island crannog, Inchnacardoch Bay, Loch Ness (SM9762) and Urquhart Castle (SM90309), caused by fluctuating water levels have been adequately assessed.

Cherry Island crannog, Inchnacardoch Bay, Loch Ness (SM9762) - This scheduled monument is situated in a shallow bay on the west side of Loch Ness. Its structure is likely to depend on the support of the surrounding water and it is likely to contain significant well preserved, water-logged deposits related to its construction and use which depend on continued submersion and would be placed at risk if exposed to drying out and especially intermittent submersion and exposure.

Urquhart Castle (SM90309) - This scheduled monument is on a promontory on the northern shore of Loch Ness, Strone Point. Water-logged deposits associated with the fort and castle's construction and use survive around the loch edge. These will also be vulnerable to exposure through changing water levels.

Fluctuating water levels in Loch Ness could place the survival of Cherry Island and significant and sensitive remains at both scheduled monuments at substantial risk. Significant further consideration will be required in order to determine the likely extent of indirect physical impacts on both scheduled monuments including cumulative impacts. Works affecting water levels around scheduled monuments also legally require Scheduled Monument Consent (SMC), obtained through Historic Environment Scotland, beforehand. SMC is in addition to planning or other consents and the obtaining of one does not preclude the granting of another. It is unlikely that we would recommend consent be granted for these proposals if impacts can be demonstrated.

We are content that the potential for indirect physical impacts on the scheduled monument of Crusader, remains of speedboat in Loch Ness (SM11070) near Achnahhanet can be discounted, on the basis that the wreckage of the boat lies in deep water at a sufficient distance from the outfall area.

From the information currently available, the proposed development has the potential to adversely impact the settings of Dun Scriben, fort (SM6220) and Dun Deardail, Forts 410m and 520m ENE of Fasnagruig (SM11884). However, we notice that not all elements of the proposed development have been accounted for in the initial Zone of Theoretical Visibility (ZTV), such as the access tracks, buildings within compounds or tunnel portal structures. We therefore consider that a bare-earth ZTV taking into account all built elements of the proposed development should be produced. The list of assets highlighted herewith is therefore not considered to be exhaustive. It is possible that once a ZTV which covers all elements of the proposed development has been prepared by the applicant, additional assets in our remit may fall within the ZTV.

Dun Scriben, fort (SM6220) - This scheduled monument consists of a prehistoric fort located on a flat-topped knoll and is located to take advantage of commanding views to the northeast and southwest along Loch Ness as well as along the high but shallow valley of the Grotaig burn between the hills of Meall Fuar Mhonaidh and Creag Dhearg. Views from the monument to the southwest are therefore key to understanding the purpose and function of the monument.

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				The proposals could appear in these outward views from the monument and in views to and from the monument from closer by. Visualisations are required to demonstrate the potential impact of new access tracks and any other above-ground infrastructure in views from the monument toward Meall Fuar-Mhonaidh. A bare-earth wireframe may be the most appropriate visualisation to demonstrate this given the currently wooded nature of Dun Scriben, fort (SM6220), but a photomontage may also be required. Further visualisations demonstrating the potential setting impact from tracks, compounds, and buildings and tunnel portal structures within them are required where these are planned in proximity to the monument. Dun Deardail, Forts 410m and 520m ENE of Fasnagruig (SM11884) - This scheduling applies to two Iron Age forts and associated outworks overlooking Inverfarigaig Bridge and Loch Ness. One fort occupies the true summit while another, 835m to the southwest, occupies a second peak. They were deliberately positioned to take advantage of views to the southwest and northeast along Loch Ness and potentially to control movement from Loch Ness to the east. A photomontage visualisation is required to demonstrate the potential setting impact on the monuments from any tailrace / outfall infrastructure on the northwest shore of Loch Ness as well as the potential setting impact from other above-ground infrastructure, including access tracks, compounds and buildings within them, and tunnel portal structures, which may appear in views toward and in the background of Dun Scriben, fort (SM6220) from the two forts. The scoping report has some inconsistencies: Section 12.4 mentions considering assets beyond 3km for assessment of changes to the setting of designated assets where their setting extends within 1km, which conflicts with Section 12.5.1 stating 3km. Additionally, Section 3.4.1.5 proposes including projects still in the planning process in the cumulative assessment, while Table 3.6 includes approved and constructed projects as cumulative developments. Clarification of these criteria is needed for a clearer methodology. Rectify “Registered battlefields” in Table 12.1 as “Inventory battlefields”.	
75	HES	October 2024	Emails	Various emails to discuss the proposed viewpoints and the types of the proposed visualisations for historic environment assets and to arrange a meeting.	N/A
76	HES	24th October 2024	Meeting	Discussed potential design changes from scoping, the proposed viewpoints and site access options.	**Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)** contains all consultation with HES and the cultural heritage assessment.
77	HES	31st October 2024	Email	Various emails to discuss the proposed viewpoints and the types of the proposed visualisations for the historic environment assets and to arrange a meeting. We appreciate that the design is yet to be frozen, but it would still be helpful to have a bare-earth ZTV taking into account all built elements of the updated proposal to understand how it has changed.	The email exchange with HES helped to inform the assessment for **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)**. This included the approach to water levels as well as visualizations.

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				Regarding the photomontage from Dun Deardail, Forts 410m and 520m ENE of Fasnagruig (SM11884), we recommended that the visualisation should be overlooking Loch Ness in addition to demonstrating the prominence of Dun Scriben, Fort (SM6220). We also welcome that you will provide a visualisation for Urquhart Castle (SM90309) from the opposite side of Loch Ness (VP5 in Figure 5-4 of the scoping report). An interpretation in the cultural heritage chapter on the implications of the findings regarding change in water level of Loch Ness (if any) would be useful in understanding the extent of indirect physical impacts.	
78	HES	6th January 2025	Email	Email exchange to determine the requirement for a photomontage from Dun Deardrail forts (SM11884) due to accessibility concerns: "For the heritage viewpoint as attached in your email, we are content that a wireline visualisation would be adequate based on the information currently available to us."	No further action required. Visualisations are provided within **Volume 4: Visualisations**. The Visualisations are to accompany **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report).**
79	HES	29th January 2025	Gate Check Response	We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas. THC's archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by our advice-giving role, and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas. The Cultural Heritage sub-section under Section 3.2 of the Gatecheck Report should also include our previous advice on the potential setting impacts on heritage assets within our remit. We note that a number of amendments have been made to the scheme since scoping. In particular, the construction access and the main operational access to the site, the locations of the proposed compounds, and the footprint of the lower control works. Whilst we were shown a revised layout plan during a meeting with the applicant's consultant in October 2024, we have not been consulted on the above amendments prior to gate check. We would recommend consultation with us on the updated design before formal submission of the application so that we can provide advice regarding potential impacts on heritage assets within our remit in the design development process and any detailed requirements for supporting information. We are broadly content that the details provided in the gatecheck report reflect Historic Environment Scotland's involvement with and advice regarding the EIA process for this development so far. Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series.	No further action required. **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)** details historic environment interests.
80	HES	5th February 2025	Meeting	Meetings to discuss and agree heritage viewpoints as well as potential impacts to heritage, including from water level changes on Cherry Island (crannog) and Urquhart Castle.	Informed **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)**.

ID	Organisation	Date	Consultation Method	Comments	Response from the Applicant
81	HES	26th February 2025	Email	Having reviewed the information provided, we require clarification of some of the information, and additional information is also necessary before we would be able to determine the level of physical impact on Cherry Island, crannog, Inchnacardoch Bay, Loch Ness (SM9762) and Urquhart Castle (SM90309). Firstly, while we trust that "All Schemes" in your table dated 6-2-2025 should be defined clearly, as it is not currently apparent whether this applies to consented schemes, schemes active within the planning system, or both. We also recommend that any cumulative assessment should clearly describe the baseline conditions by first identifying the presence of existing constructed development. It should then describe the extent to which existing constructed development has impacted the water level. Finally, impacts on water level from additional development (i.e. the subject proposed development, and other schemes consented and/or active within the planning system) should be assessed. Secondly, we are concerned by the figures detailing the alteration in the water levels of the Loch in both the assessment for Glen Earrach PSH alone and the cumulative assessment. We understand that "All schemes with Seasonal variable weir" would result in an increase in the time that the water level would be higher than the 16.5m strand line for Cherry Island crannog from 2.7 days to 36.5 days. This is a substantial increase, and we are concerned that we are at a tipping point where the effects of the cumulative proposals on the archaeology would be at a level where it would adversely impact the national significance of the monument. We require more information on the nature of this water level fluctuation: (i) Are there predicted scour effects on the crannog and its archaeological deposits? Can this be modelled? (ii) We require more detailed information on the frequency and scale of the water levels above the 16.5m mark: does the 36.5 days relate to full day events of flooding, or how many hours would these events occur in those days? During these 36.5 days over 16.5m, would the water level vary drastically? (iii) Are we correct in understanding that the seasonal variable weir would prevent the water levels from exceeding the predicted maximum water level for Glen Earrach alone and all schemes cumulatively? We note that the information concerning the changes to the water level of the loch has only been provided for Cherry Island, crannog, Inchnacardoch Bay, Loch Ness (SM9762). We also require all the information provided, and that requested above, for Urquhart Castle (SM90309).	The methodology for the cumulative assessment is described in detail in **Chapter 4: Approach to EIA (Volume 2: EIA Main Report)**. This includes the approach set out in relation to the assessment of the Seasonal variable weir. The cumulative assessment for cultural heritage is detailed in **Section X** of **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report).** The scour effects on Cherry Island Crannog (SM9762) are discussed in **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)** The frequency and scale of the water levels and the full water level modelling is in **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**. The frequency and scale of the water levels as they relate to scheduled monuments and historic environment interests is detailed in **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report).** The outcomes of the water levels assessment in relation to the seasonal variable weir is also discussed in **Chapter 11: Flood Risk & Water Resources** and **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report).**
82	Transport Scotland and BEAR Scotland	22nd January 2024	Introductory Meeting	Meeting to introduce the Proposed Development to Transport Scotland and to outline the approach to the transport assessment.	N/A
83	Transport Scotland	6th June 2024	Scoping Opinion	This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Transport Scotland would provide the following comments. The nearest trunk road to the site is the A82(T), with the possibility of two points of access being taken from the A82(T) and one from the A831. While we note that one of the potential A82(T) access points has been used to route forestry / tree felling traffic to and from the A82(T), Transport Scotland would state that any	**Chapter 13: Access, Traffic and Transport (Volume 2: EIA Main Report)** provides an assessment of the impact on the trunk road network on all stated points. Transport specialists have been in direct contact with Transport Scotland to ensure

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				proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager. In addition, we would advise that 1:500 scale plans of any new or modified access from the trunk road should be submitted with the application along with visibility splay plans to allow the standard of the proposed access junctions to be assessed. Chapter 13 of the Scoping Report presents the proposed methodology for the assessment of the potential effects of Access, Traffic and Transport. This states that the assessment will be based upon the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement, July 2023. Transport Scotland is satisfied with this approach. We note that construction of the PSH will require temporary traffic management measures on the A82(T) which are likely to be required for a significant period of time and also will very likely require a significant temporary re-alignment of the current A82(T), consequently, pre-scoping discussions with Transport Scotland were carried out in January 2024. The results of these discussions have been identified within the SR, and are as follows: • Two-way traffic on the A82 should be maintained at all times. Only very short closures or one-way working periods could be considered. • Temporary reductions in A82 speed limits in the vicinity of works could be considered. • Typically speed reduction measures are implemented for periods up to 18-months. Use of temporary traffic lights should be avoided in order to maintain two-way traffic flow and capacity on the A82. • Temporary re-alignment of the A82 to the west would be challenging due to topography and geology (rock), but realignment to the east could be investigated. • Construction techniques for inlet / outlet tunnels passing under the A82. No preference from Transport Scotland at this pre-scoping consultation stage. Works could encompass placing the A82 on fill or structure above inlet / outlet tunnels if required. Transport Scotland noted the scenic nature of the road so the visual impact of any inlet / outlet structure should be considered. The eventual construction methodology should ensure disruption to the safe and efficient operation of the A82 is minimised. The study area for the assessment has been identified as the A82(T) and the A831. Chapter 13 states that a “limited number of junction turning counts would be carried out where construction traffic passes or turns through A-road junctions on the A82(T) trunk road network”. In addition, base traffic data “may include Transport Scotland and The Highland Council.” We would state that a suitable source of traffic data is Traffic Scotland’s National Traffic Data System. Should Department for Transport (DfT) traffic data be utilised, we would ask that “estimated” data from the DfT site be avoided. We would also request that National Road Traffic Forecast (NRTF) Low Traffic Growth assumptions be used to provide a common future year baseline to coincide with the expected construction traffic peak. Chapter 13 states that an initial abnormal load route review will be prepared and included in the Technical Appendix to the forthcoming EIAR. This is considered appropriate, and Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.	that the assessment methodology aligns with their requirements.

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				The Abnormal Loads Assessment report should identify key pinch points on the trunk road network. Swept path analysis should be undertaken and details provided regarding any required changes to street furniture or structures.	
84	Transport Scotland	5th February 2025	Gate Check Response	Having reviewed the Gatecheck Report (GR), I note that our previous response is included within Part 3 of the GR, while Table B.2 (Scoping Consultation Summary of Key Issues and Response with Action Taken) as presented in Part 1 states the following: An assessment of the impact on the trunk road network will be provided in Chapter 13 Access, Traffic and Transport of the EIAR. Transport specialists are in direct contact with Transport Scotland to ensure the assessment methodology aligns with their requirements. I can confirm, therefore, that Transport Scotland is satisfied that the comments made in our response of June 2024 will be taken account of in the forthcoming Environmental Assessment and we have no further comment to make at this time.	No further action required. **Chapter 14: Access, Traffic & Transport (Volume 2: EIA Main Report)** contains further details on the transport assessment.
85	BT	5th June 2024	Scoping Opinion	We have studied this Glen Earrach Pumped Storage Hydro scoping proposal with respect to EMC and related problems to BT point-to-point microwave radio links. We have plotted the central location provided (NH4525522395) and reviewed the infrastructure located inside of the Red Line Boundary. As you can see from the screenshot provided BT Radio Link PORT CLAIR FOREST BT RS to DAVIOT WOOD BT RS is within the vicinity. Due to the proximity to our Radio Link can I please ask that you provide the exact heights and grid references for any structures at height within the Red Line Boundary? Once this information is received, we will be able to access this for you and provide BTs stance on this proposal.	No map showing the location of the asset provided from the ECU. BT will be engaged with directly to ensure that no impact will be made on the BT Radio Link identified in the response.
86	Buglife Scotland	27/06/2024	Scoping Opinion	The Scoping Report has identified 12 named water bodies within the development site, with further unnamed waterbodies within the development boundary. Although the desk study undertaken did not generate any records of notable invertebrate species, it was acknowledged that is this likely to be due to data deficiency, rather than an indication of absence of species of conservation concern. The report identifies Freshwater Pearl Mussel and Northern Damselfly as Scottish Biodiversity List (SBL) species relevant to habitats within the scheme. Local Biodiversity Action Plan species of relevance that have been identified are Upland Summer Mayfly and Azure Hawker. The Report has determined that the development could result in potentially significant effects to ecological features including permanent habitat loss, habitat degradation, permanent or temporary changes to hydrological conditions and increased risk of invasive species. For aquatic macroinvertebrates the impacts of drawdown are of particular concern. PSH schemes typically increase the frequency of fluctuations in water levels and these fluctuations are likely to be more rapid and more frequent than more gradual natural fluctuations. Adequate surveys must be undertaken to understand the invertebrate communities that are present to determine the magnitude of impacts. From data provided, Buglife states that a worst-case scenario of a maximum operational drawdown of over 1.0m must be considered.	• An assessment of terrestrial invertebrates has been included within **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)** and aquatic invertebrates has been included in **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report).** **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)** assesses the potential impacts and effects on ecological features, including important terrestrial invertebrates; • Regarding terrestrial invertebrates, habitat impact primarily involves blanket bog and wet heath, which are unlikely to support significant invertebrate assemblages and also occur very

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				Buglife have compiled a table which details the taxa known to be present in Loch Ness and groups them by their sensitivity to water fluctuations. Buglife welcomes that further surveys are proposed for macroinvertebrates and highlights these surveys must be comprehensive to ensure a full understanding of impacts. Buglife are concerned that the proposed method for surveying all water features will be based on 'River Invertebrates WHPT UKTAG Method Statement'. This method is designed for assessing invertebrates in rivers in relation to general degradation and is not appropriate for assessing the impacts of the proposals on aquatic invertebrate communities in Loch Ness and Loch nam Breac Dearga. The number of sampling locations should ensure that adequate coverage is achieved of the shorelines of both lochs where drawdown impacts are predicted (e.g. shallow bays). Surveys should include spring and autumn sampling as a minimum to ensure they capture seasonal variation to cover the most detectable life stages of species groups such as caddisflies and mayflies. Invertebrates should be identified to species wherever possible. The Community Conservation Index (CCI) should be used to determine the conservation value of the affected areas. Buglife recommend identifying taxa that are intolerant of excessive water fluctuations. Buglife understand that to date only an initial walkover survey has been undertaken in January 2024 and full habitat surveys have not been completed. However, it is concerning that at this early stage, further surveys for invertebrates appear to have been scoped out. The site is located adjacent to the East Inverness-shire Important Invertebrate Area (IIA)10. Northern Damselfly has already been identified as a species that could be relevant to the scheme and Buglife are aware of records for the Vulnerable Brilliant Emerald Dragonfly from the East Inverness-shire IIA. In close proximity to Loch nam Breac Dearga there are a number of records from the NBN Atlas11 for the Rare cranefly species, which is associated with blanket bog. Habitats identified within the site boundary could support SBL species and other notable species of conservation concern. Direct habitat loss and indirect impacts all have the potential to adversely affect the invertebrate assemblage. Therefore, surveys should be considered. Given the range of habitats impacted, Buglife recommends terrestrial invertebrates are considered within the EIA, with any necessary invertebrate surveys undertaken.	extensively beyond possible impact. Sphagnum-rich lochan peripheries potentially suitable for emerald dragonflies is most obvious at certain lochans north of the Headpond, all of which are retained.; • Impacts on woodland would be minimal, and whilst a thin band of ancient semi-natural woodland beside Loch Ness would be affected, it has been very largely avoided by careful design.; • Targeted survey for terrestrial invertebrates was therefore scoped out for the reasons above and because desk study information supplemented by incidental records was considered sufficient to carry out the assessment. Habitat enhancement, as set out in the **oLEMP**, includes creation of substantial ponds for emerald dragonflies, near trees/shrubs and with *Sphagnum*-rich parts Details of the action taken regarding aquatic invertebrates are provided in **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**.
87	Caley Cruisers Ltd	15th May 2024	Scoping Opinion	While we are not objecting, we have growing concerns due to the number of proposed schemes and the potential combined effect. We have concerns about the operability of the canal, its moorings, lochs and overall navigability. In particular, we have concerns to the water level needed for access into Urquhart Bay Harbour and the exposed steel work (without fendering) when the water levels drop lower than 'normal'.	Water levels have been modelled in **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**.

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				In the particular low water due to natural causes last years, issues that came about included visible sandbanks on either side of the channel on entry to Urquhart Bay, lifeboat slip access issues, dredging the harbour entrance, and the wooden fendering causing damage to boats. On the other side the water level was that high at points it was over the harbour wall and flooded the harbour. If the level of the loch was to move over a 24-hour period significantly bathing platforms could be caught under the harbour and snap off/boats could be grounded. It has happened in the yard on an occasion where Scottish Canals significantly changed the level overnight – bathing platforms were snapped off and boats were left sitting on their keels.	
88	Crown Estate Scotland	31st May 2024	Scoping Opinion	Email confirming that the assets of Crown Estate Scotland will not be affected by this proposal.	No further action required.
89	Forestry and Land Scotland (FLS)	13th March 2024	Meeting	Meeting to discuss the project and FLS land in particular: - Working on the slope adjacent to the A82 - The Land Management Plan gives an indication of when different cops are planned to be felled, which gives an idea of when the North access route is likely to be busy with lumber trucks. This could be mitigated by works on the track for passing places. - The provision of BNG on FLS ground – including choosing tree species which will help with slope stabilisation.	No action required. Further consultation has taken place with FLS to inform the design and to feed into **Chapter 18: Forestry (Volume 2: EIA Main Report)**
90	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	The following should be included: • a full description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. • Full description of project required to enable full assessment of project. • a plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied; • a description of the main characteristics of the production processes, • a full description of the project construction phases including an overview of activities and impact of each phase. • a materials management plan • the risk of accidents, particularly re substances or technologies used; • an estimate, by type and quantity, of expected residues and emissions resulting from the construction phase and operation of the development; and • an estimate of the cumulative impact of the project in combination with other consented or operational developments **<u>Alternatives</u>** • A statement that outlines the main development alternatives considered by the applicant and an indication of the main reasons for the final project choice is required • options for access.	The comment describes the standard methodology to the EIA. **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)** provides details on the components of the Development. **Appendix 15.1 Material Management Appraisal (Volume 5: Appendices)** contains information on material management. A cumulative impact assessment is handled within each topic chapter of the EIAR **(Chapters 6-18 (Volume 2: EIA Main Report)**. The risk of major accidents is covered within **Chapter 11: Flood Risk & Water resources (Volume 2: EIA Main Report)** An assessment of the expected emissions and residues is covered throughout the EIAR **(Chapter 6-18 Volume 2: EIA Main Report)**. Alternatives are described within **Chapter 3**

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				• design and locational options for all elements of the proposed development, including grid connection; and the environmental effects of the different options examined. Such an assessment should also highlight sustainable development attributes e.g. assessment of carbon emissions. The EIAR must provide a description of all aspects of the environment likely to be significantly affected by the development, including cumulative effects of other large-scale developments. NPF 4 must be taken into account along with the Highland-wide LDP, and guidance taken from the Highland Renewable. A Sustainable Design Statement should be included, taking reference from the Council's Sustainable Design Guide.	**Evolution of Design and Alternatives (Volume 2: EIA Main Report).**
91	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	The EIAR should consider both the landscape and the visual impact of the development. Visualizations to be provided in form of virtual tour over study area – rather than flat photo montages from representative viewpoints. Visualisations to be provided for all phases of development. Visual Impact assessment to outline considered and potential mitigation measures noted during design.	The Landscape and Visual Impact Assessment (LVIA) assesses the impact of all parts of the Scheme set out within **Chapter 2: Project and Site Description (Volume 2: EIA Main Report)** on landscape and visual receptors. Visualisations will be prepared for year 1 and year 15 of operation to demonstrate the change when landscape mitigation is considered to have matured at year 15. This is standard practice within LVIA and relates directly the assessment of effects. The embedded mitigation measures are set out within **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)** and will be used to inform an assessment of effects on both landscape and visual receptors. Further details are provided in **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)**.
92	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	There should be full surveys completed of all habitats, particularly rare and threatened habitats and include upper and lower plants, breeding birds, including migrating birds, and animals, including mammals, reptiles and amphibians. It should be established which species are present on site and their location before any application is submitted. Habitat enhancement and mitigation measures should be detailed along with any priority species within the Highland Nature Biodiversity Action Plan.	Detailed habitat survey including National Vegetation Classification (NVC) survey, and aquatic surveys, are detailed in **Chapter 7: Terrestrial Ecology (Volume 2: EIA Main Report)**.

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				Habitat assessment to confirm Habitats Regulation Appraisal completed as required	Habitat enhancement and mitigation measures have been developed cognisance of both protected and priority species including BAP species and can be seen in the oLEMP (**Appendix 6.4: Outline Landscape and Ecology Management Plan (Volume 5: Appendices)**). The HRA is covered in **Appendix 7.2 Statement to inform HRA (Volume 5: Appendices)**.
93	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	The nature of the hydrology and hydrogeology of the land must be addressed, along with an assessment of the potential impacts on water courses, water supplies particularly private supplies, groundwater, water quality and quantity and on aquatic flora and fauna. Measures to prevent erosion, sedimentation or discolouration will be required along with monitoring and contingency plans.	All points are covered in **Chapter 10: Water Environment (Volume 2: EIA Main Report)** and **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**. The comment encompasses the standard methodology which will be delivered.
94	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	All designated and non-designated cultural heritage sites that could be affected by the development, directly or indirectly, must be identified.	Cultural heritage is assessed within **Chapter 12: Cultural Heritage (Volume 2: EIA Main Report).**
95	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	A construction traffic management plan will be required. This should include impacts on carriageway, other road users, adjacent communities, road safety measures etc It is noted that the proposed access route will follow the lines of some existing tracks. Indicate which sections of the proposed access track are to be made from existing tracks that are to be upgraded, and which will be newly constructed, and sections of the proposed access track would permanent and which would be temporary.	A Construction Traffic Management Plan (CTMP) is included within **Appendix 13.1 Transport Assessment (Volume 5: Appendices)** which accompanies **Chapter 13: Access, Traffic & Transport (Volume 2: EIA Main Report)**. **Chapter 16: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)** and **Appendix 16.1 Outline Access Management Plan (Volume 5: Appendices)** provides information on proposed access tracks out with the local road network, and the use of existing access tracks.
96	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	A detailed construction and operation noise assessment will be required along with an assessment of vibration, from construction and operation works, affecting adjacent communities and buildings.	Direct contact was established with the EHO to ensure the assessment aligns with any requirements - the noise monitoring approach was agreed with the EHO. The details of the noise and vibration assessment can be seen in **Chapter 14:**

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					Noise and Vibration (Volume 2: EIA Main Report).
97	Glen Urquhart Community Council	29th July 2024	Scoping Opinion	The EIAR should estimate who may be affected by the development, The application should include relevant economic information connected with the project, including the potential number of jobs and the economic activity, both regional and local, associated with the procurement, construction, operation and decommissioning of the development. EIAR should outline community engagement process including establishment of community liaison group and process for communication to community on all aspects of project. Developer should outline process of partnership with community and impacted groups.	The stated points are covered in **Chapter 16: Socio-Economics, Tourism and Recreation (Volume 2: EIA Main Report)**.
98	Highland and Islands Enterprise (HIE), Transport Scotland, and Caledonian Canal	10th September 2024	Meeting regarding the use of the Caledonian Canal for PSH Developments	Meeting to discuss the need for developers to work together, particularly on shared infrastructure such as the canal and ports.	No further action required.
99	HSE	21st May 2024	Scoping Opinion	HSE's interest in applications for consent to construct and operate electrical generating stations such as the Glen Earrach Pumped Storage Hydro is very limited. HSE has an interest in proposals where developments will be located in HSE zones. A check of our land use planning consultation zones shows the route is not within any explosive safeguarding zones. The Glen Earrach Pumped Storage Hydro is not located within any HSE zones. HSE also has an interest in proposed developments that would have hazardous substances present at or above threshold quantities [see the Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015]. However, Glen Earrach Pumped Storage Hydro does not appear to be of this type. Therefore, HSE's Land Use Planning team have no further comments.	No further action required.
100	Joint Radio Company	27th May 2024	Scoping Opinion	This proposal is cleared with respect to radio link infrastructure operated by the local energy networks. In the case of this proposed energy development, JRC does not foresee any potential problems based on known interference scenarios and the data provided. However, if any details of the development change, particularly the disposition or scale of any structures, it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference. In making this judgement, JRC has used its best endeavours with the available data, although we recognise	No further action required.

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				that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted. It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.	
101	Mowi Fish Farm	6th June 2024	Scoping Opinion	Mowi Scotland operates a long-established freshwater pen fish farm in Loch Ness, near to the village of Dores for the production of Atlantic salmon smolts. The presence of the fish farm is recognised within the scoping report however it is limited to two brief references and the absence of consideration of effects on the fish farm is a concern. No specific assessments on the potential effects on the operation of our Loch Ness fish farm are proposed to be scoped for inclusion in the EIAR. We would consider that this is a material omission. In addition, there is no reference to the economic importance of fish farming in the Socio-economic chapter of the Scoping report despite the presence of the Loch Ness fish farm. Permanent hydrological modification to the fish farm as a result of the development means impacts must be scoped into the EIAR. We would request that the Water Environment and Water Resource Assessments outlined in the Scoping Report be expanded to examine the specific risk to the fish farm and, if required identification of appropriate mitigation measures and actions. In terms of Sections 10 and 11 of the Scoping Report we do not consider that the proposed assessments are sufficient. We would request the following issues that require to be examined in detail within the EIAR. <u>Construction Phase Impacts</u> An assessment should evaluate the risk of construction-phase pollution affecting the Loch Ness fish farm, particularly regarding suspended solids and metal release from excavations. Despite the farm's distance from the main site, potential runoff entry points into Loch Ness must be identified. Elevated suspended solids can affect native fish and farmed salmon. The assessment must define particle sizes to evaluate their dispersion and transport. Small particulates remaining in suspension could travel long distances via wind-driven currents, requiring examination in the EIAR. Metal release from soil and rock excavations poses a risk to wildlife and fish, including native and farmed salmon, due to its persistence and toxicity even at low levels. The EIAR should assess these risks, with a specific focus on farmed fish health. The Scoping Report notes potential water quality and hydromorphological effects during construction. Maintaining water quality across the catchment, especially in Loch Ness, is crucial for both native and farmed fish. Impacts should not be seen as inevitable; effective mitigation, continuous monitoring, and independent oversight are essential. The size of Loch Ness should not be relied upon as a pollution buffer. <u>Operational Phase Impacts</u> A key concern is the impact of water level changes, both high and low. Mowi's other freshwater farms in hydro-operated lochs have experienced significant disruptions from such fluctuations. Given existing and planned PSH schemes, Loch Ness is especially sensitive to further water level changes. The Scoping Report correctly identifies existing and proposed hydro operations in the Loch Ness catchment,	The assessments of water quality are considered within **Chapter 10: Water Environment (Volume 2: EIA Main Report)** and the operational impacts as a result of changing water levels in Loch Ness are considered in **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**. Noise and vibration during construction is considered within **Chapter 14: Noise and Vibration (Volume 2: EIA Main Report).**

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				all of which will impact water level management. The EIAR must assess these effects, including potential impacts on the fish farm, with a cumulative evaluation of water level changes from current and planned pumped storage hydro schemes. The EIAR should assess: - Water level changes on mooring systems and stock containment at the Loch Ness fish farm. - Impacts on shoreside infrastructure, including slipways and vessel pontoons, which are essential for year-round access, particularly during fish transfers. - Changes in the frequency of high and low water levels, as increased extremes could affect operational flexibility, especially for fish transfer timing.	
102	Network Rail	29th May 2024	Scoping Opinion	The Scoping Opinion should address potential impacts on the safe and efficient operation of the railway. A Traffic Assessment should evaluate construction traffic effects on existing and public roads, identifying preferred routes. This will help Network Rail assess impacts on crossings over or under its infrastructure and their suitability.	**Chapter 13: Access, Traffic and Transport (Volume 2: EIA Main Report)** addresses all stated points.
103	Office of Nuclear Regulation	15th May 2024	Scoping Opinion	ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site. Information concerning the Land Use Planning consultation process can be found online.	No further action required.
104	NATS safeguarding	16th May 2024	Scoping Opinion	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of enroute air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	No further action required.
105	Ness District Salmon Fisheries Board (NDSFB)	13th March 2024	Meeting	Concerns raised about the potential water temperature rise that might be caused by the Proposed Development. Suggestions re trapping and tracking, and depending on what the research shows, this might have to be something that is envisaged. NDSFB noted concerns raised about hydrology and water flows, especially the Canal as it is an existing problem.	A continuous dialogue was set up with the NESS District Salmon Fisheries Board (NDSFB). A smolt tracking study was proposed, as part of **Chapter 9: Aquatic & Marine Ecology** to help understand the movement of Atlantic Salmon (*Salmo salar*) smolts within the Loch Ness catchment. The smolt tracking study will be taking place post-submission and will inform the choice of mitigation proposed for

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				Possible worst-case mitigation would be that the GE PSH has to stop pumping/generating when the fish are going by.	**Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. Further details are provided within the chapter.
106	NDSFB	6th June 2024	Scoping Opinion	As noted in Chp. 7 of the Scoping documents "migratory species Atlantic salmon and brown/sea trout have the propensity to be within the vicinity of the Development during their migrations as both adult and juveniles. As such, there is a potential direct impact pathway to these species once the Development is operational". This reason, and many others, highlights the unsuitability of Loch Ness for the current proliferation of PSH proposals. There is global interest in PSH, but elsewhere sensitive receptors, such as Loch Ness, are protected from harmful developments of this nature. In response to the proliferation of PSH schemes proposed for Loch Ness, Ness DSDB commissioned the Norwegian Institute for Nature Research (NINA) to investigate the impact of pump storage hydro generally, and specifically on Loch Ness. The report found that "Overall, we found a lack of knowledge about how Atlantic salmon migrate through the loch, which is imperative for understanding how closely they will encounter the proposed projects. We also found a lack of knowledge about how the new PSH schemes might impact the flow patterns and temperature regimes in Loch Ness, which will have implications for migrating salmonids and the broader aquatic community in the loch". These concerns remain outstanding. The NINA report is available to download. The potential for harm arising from the Glen Earrach is exacerbated by the cumulative impact of what multiple PSH schemes utilising Loch Ness. The potential daily drawdown if all four schemes were operating on the same cycle is in the order of 1m, potentially up to 1.2m, if the worst-case scenario figures illustrated in the Loch Kemp EIA are used. The main concerns of Ness DSFB regarding the cumulative impact of existing, consented and proposed PSH on Loch Ness, and associated watercourses include: - PSH inlet/discharge structures may delay and increase predation on migrating Atlantic salmon smolts, particularly from the River Moriston SAC. Any negative impact on smolts could affect salmon populations, rod-catch levels, and predator species like Moray Firth bottlenose dolphins. - PSH schemes have the potential to affect water temperatures in both the upper and lower reservoirs. These impacts are acknowledged in 10.7.2 of the Scoping document. If all current and proposed PSH schemes were operational at full capacity on Loch Ness the volume of water turned over in a 24hour period could be as high as 58Mm3, which is equivalent to greater than 1m of water across the entire loch. Under summertime stratified conditions, this could result in the water above the thermocline being overturned in less than 20 days. The implications of such a high level of PSH activity on the temperature regime and stability of loch stratification are potentially profound. - Daily drawdowns of around 1m would severely harm the shoreline ecology of Loch Ness. Rapid, frequent drawdowns damage littoral invertebrate populations, which in turn affects species dependent on them, including Atlantic salmon, brown trout, eel, and shoreline birds. - Large fluctuations in Loch Ness water levels will significantly impact flows in the River Ness. When Foyers PSH was built in the 1970s, gates were installed at Dochfour Weir to smooth out	NDSFB have been engaged with directly in relation to salmon smolt and the wider issued raised in their response. **Chapter 10: Water Environment** and **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)** provide an assessment of the water level and flow changes and potential impacts on the water environment and resources. **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)** is informed by a detailed literature review **(Appendix 9.1 Aquatic Ecology Baseline Report (Volume 5: Appendices))** and existing data on salmon smolt. A further salmon smolt study will be undertaken post-submission to evaluate the EIAR assessment and additionally inform the detailed mitigation measures. The further salmon smolt study scope has been developed with feedback from NatureScot, NDSFB and THC.

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fluctuations. However, these gates have struggled to fulfil their intended purpose. It remains uncertain how impacts from 1m Loch Ness drawdowns will be effectively mitigated.

- The Ness DSFB focuses on the Loch Ness ecology, but discussions with other organizations highlight issues with low water levels. While minimum levels are protected by an SSE-Scottish Canals agreement, they dropped below minimum in May 2023. With increased competition for water, minimum levels are likely to become more frequent, possibly daily.
- Under NPF4 developments such as PSH will only be supported 'where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention'. This remains the most significant challenge for PSH on Loch Ness.
- The Scoping document mentions an indicative substation location but provides no details on the grid connection infrastructure or route. At the "public engagement" event in Drumnadrochit, local residents expressed frustration over the lack of information on this issue.

Potential Impacts of Proposal Cumulative Water Movements

The Glen Earrach scheme's water flow rate during generation is estimated at 500m³/s, based on a 27Mm³ headwater storage and 15-hour duration. Combined with other existing or consented schemes, the total water moved during generation could reach around 1300m³/s, with pumping abstraction at about 1100m³/s. For context, the River Ness' mean flow is 90m³/s, with the highest recorded flow at 800m³/s in 1989, which caused significant damage. The combined pumping capacity of the four schemes would exceed the highest recorded flow, potentially occurring daily. The effects of such large water movements on Loch Ness' thermal profile and natural processes like stratification are not well understood but are likely to be significant.

Salmon Smolt Migration

All salmon smolts migrating from Loch Ness tributaries will pass near one or more PSH schemes. Ness DSFB is unaware of research on how smolts interact with PSH intakes during pumping or generation. There are concerns that smolts may be attracted to intakes, delaying their migration and increasing predation risk. Previous tagging studies show that Loch Ness smolts struggle to exit the loch, with some entering the Caledonian Canal at Dochgarroch, where survival rates are poor. Smolts from the River Garry also face risks in the canal, with some diverted to the Lochy at Cullochy Locks and Laggan.

Shoreline Ecology

Rapid and frequent drawdown/inundation cycles is extremely damaging to the littoral ecology. Smith et al. (1987) found that the richest littoral invertebrate communities were found in lochs with annual water level fluctuations (AWLF) of less than 5 metres and weekly water level fluctuations (WWLF) of less than 0.5 metres. Where the AWLF is greater than 5 metres, or the WWLF is greater than 0.5 the invertebrate community was impoverished. The scale of PSH operation planned for Loch Ness will degrade the littoral invertebrate from its current good status to impoverished.

Downstream Flows

When Foyers PSH was built, its potential impact on River Ness flows was mitigated by gates at Dochfour Weir. However, the Glen Earrach scoping document proposes no new mitigation for the large, frequent fluctuations in Loch Ness levels. Section 11.6.2 suggests that existing gates would adequately address impacts from the Glen Earrach scheme, but Foyers PSH typically alters the Loch Ness level by 0.09m,

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				whereas the cumulative effect could be ten times greater. This would result in significant flow variations in the River Ness, potentially beyond the mitigation capacity of the Dochfour gates. Neither the Glen Earrach scoping nor Loch Kemp planning documents address this issue.	
107	NDSFB	6th June 2024	Scoping Opinion	**Comments on the Scoping Document** Clause 1.3: The Applicant claims that the Glen Earrach site "might be one of the most important PSH sites in Europe, because of its location in relation to the grid, its topology, hydrology and geology". Given the head available the Glen Earrach site may well have some advantages from a generation perspective (financial), but this claim needs to be challenged as for every other metric it appears to be one of the least suitable sites. The biodiversity, environmental and social issues arising from the development of Glen Earrach would be considerable, as would the impacts on indigenous businesses and the local service and tourism economy. Universal concerns regarding pump storage hydro mean that, globally, sensitive locations such as Loch Ness would be protected from harmful developments such as these, including in the UK (SQW, 2011) and internationally off-stream, or closed-loop schemes are prioritised (Stantec, 2023., and National Hydropower Association, 2021). The focus on drawdown per GWh avoids drawing attention to the actual drawdown. Readers have to wait until Section 2.7.4.5 for that information. Clause 2.5: This quote highlights a key design parameter i.e., that the scheme was conceived to run for a full 15hours 'and capacity required to achieve a single continuous generating/pumping cycle of 30 GWh'. This would result in a change in the level of Loch Ness by at least 42cm, potentially as high as 48cm, given the storage capacity of the upper reservoir. This design parameter statement contradicts claims made elsewhere that it is "unlikely that the scheme will fully empty then immediately fill" (Clause 2.7.4.5). Table 2.2: The working volume of the upper reservoir is stated as 27Mm^3. As the surface area of Loch Ness is 56.4km^2, the release of the full working volume from the upper Reservoir would increase the level of Loch Ness by 47.8cm or deplete by the same amount during pumping. Clause 2.7.4.5: This quote 'A management/water use agreement will need to be confirmed with other water users in the Ness catchment to ensure there is sufficient water resource for all parties', is interesting as previous CAR licences for Foyers and the Red John scheme (now Loch na Cathrach) implied that SEPA were taking a tiered approach to issuing CAR licences, including stop-generation water levels. For example, the CAR licence for Foyers permits the operator to pump until the loch level reaches 15.27m AOD. However, the equivalent CAR licence stop-generation figure for Red John is 15.33m. If the same approach is taken for Loch Kemp, and any subsequent PSH schemes, each successive scheme will be constrained to an even greater extent. Our own analysis for the Loch Kemp scheme concluded that it would be constrained for much of the year, and that there was simply no water left for any additional schemes. We request that a full water resource model is produced by Glen Earrach, looking at the cumulative impacts of multiple schemes sharing the same lower reservoir, and that the extent of potential constraints on the operation of each scheme can be understood by all. The estimated drawdown in Loch Ness is stated at 46cm, which is lower to the calculated value above (Table 2.2 section). Clause 4.2.2: Figures from Aurora Energy are quoted for the National requirements for long-duration electricity storage. We have seen many differing claims regarding the requirement for storage, which must be constantly changing given the rapid rise in battery energy storage systems. NPF4 creates a presumption in favour of PSH, without providing any guidance regarding the quantity or location. Hence, we now face the	Inundation of peat bog is considered within **Chapter 15: Geology and Ground Conditions** as well as in **Chapter 17: Climate and Chapter 7: Terrestrial Ecology**.

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				situation where developers compete to pump the last available water in Loch Ness dry. Clause 6.4.2: What will happen to peat/blanket bog within the inundated area of the upper reservoir? It would be unacceptable for soils and peat to be inundated. This would result in erosion, fragmentation, liquification, and ultimately transfer into Loch Ness where it would cause discolouration, of an otherwise relatively clear loch, and settlement on the loch bed, with deleterious impacts for its fauna. Clause 7.2.4: We note that Bottle nosed dolphins are recognised as being potentially at risk. We have argued previously that any diminution in the Ness salmon population will have wider ecosystem effects, most notably on the frequency and abundance of dolphins at natural narrowing's (where migrating salmon are concentrated) such as Chanonry Point. Being highly efficient topline predators, dolphins will likely take a certain number of salmon annually. If numbers of emigrating smolts are depleted due to the proliferation of PSH, then the number of adults returning from their ocean migration and reaching the River Ness (after running the dolphin gauntlet) may be compromised to the extent that egg deposition is severely impacted, thus triggering a downward population spiral, with trophic level impacts on the Moray Firth dolphin population. The sight of dolphins feeding on returning adult Atlantic salmon, within metres of the shoreline, at Chanonry, is arguably the greatest wildlife spectacle in the Highlands and an irreplaceable biodiversity highlight. Clause 7.3: We ask for clarity regarding this statement 'The potential impact on salmon smolts will be considered against existing data'. Clause 7.4.2: 'Loch nam Breac Dearga (Translated as 'Lake of the Red Trout' – arctic char)'. We have heard alternative translations e.g., Loch of the red speckled Trout. Maitland & Campbell, 1992, record that Breac is the Scottish Gaelic for brown trout, with Tarragan cited as Gaelic for Charr. We are aware of anecdotal reports of Arctic charr in Loch nam Breac Dearga, but this would need to be confirmed. Clause 7.5.3.2: The proposal to use eDNA to establish the fish population of nam Breac Dearga is welcomed. The Centre of Expertise for Water (CREW) recently organised a workshop on Methodologies for Sampling Fish Populations in Scottish Freshwater Lochs. The report from this workshop is available here. This report should guide the fish population assessment and monitoring requirements for the Glen Earrach PSH in Loch nam Breac Dearga and Loch Ness. Clause 7.5.3.3: Given the extent of the potential drawdown on the entire littoral zone of Loch Ness, invertebrate sampling in Loch Ness should be comprehensive, and cover a range of habitats, including shallow bays, and beaches, where the impact of drawdown would be much greater than on steep rocky shorelines, as occur in the vicinity of the proposed intake structure. Clause 7.6: To the list of Potential Significant Effects on Atlantic salmon we would add the potential for delay and enhanced mortality of migrating smolts attracted to the vicinity of PSH intakes during pumping. Otherwise, the list of potential scheme effects is comprehensive.	

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				Clause 10.7.2: We note that the scoping document recognises that there may be impacts on Loch Ness water temperature, and thermal stratification (local). In order to address these concerns, we request that the developers commission a study to report on potential impacts of the Glen Earrach scheme on the water temperature profile of Loch Ness and its potential impact on natural limnological processes such as thermal stratification. Clause 11.4.11: We note the mantra 'Unusually for an oligotrophic water body, water clarity is very poor due to the presence of humic acids leached from the peat rich soils in the surrounding catchment' is quoted. The River Ness is known for the clarity of its water and compared to many similar Scottish lochs water clarity is relatively clear. We regard Loch Ness as being a relatively clear loch. Clause 11.5.1: We expect the cumulative water resources assessment to be comprehensive and to take into consideration all potential uses of water in Loch Ness. This assessment should detail the water resource availability and allocation for existing and prospective PSH schemes, potential stop- generation levels and implications for scheme curtailment. Clause 11.6.2: We disagree strongly with paragraph 3 in this clause. Mitigation of flows in the River Ness due to variations in the level of Loch Ness is the elephant in the room as far as PSH developers on Loch Ness are concerned. Anyone with knowledge of Dochfour Weir, a very large water level regulating structure, on flows in the River Ness, will understand that small variations in the level of Loch Ness can result in large changes in river flows. The range in loch level variations and the rapidity with which they could occur if all proposed PSH schemes are built will mean that the River Ness would be transformed from a very stable flow regime into a hydro-peaking river, with all the detrimental impacts that will entail. In our response to the Loch Kemp planning application, we documented the previously stated aspiration of its developers to increase the height of Dochfour Weir so that additional water could be stored in Loch Ness to improve the viability of that scheme. That aspiration was not mentioned in the Loch Kemp planning application, but it is likely to follow in subsequent applications. The question whether Glen Earrach intended to submit an application to raise the height of Dochfour Weir was put directly to Roderick Macleod, Glen Earrach Director, at a roundtable discussion (Drumossie Hotel, 23rd May 2024). The answer was not at present, or words to that effect. Clause 11.7.2: We note that the wording regarding mitigation, in the eventuality that, 'existing downstream abstraction arrangements are found to be significant' is vague. The development of operational rules to manage water conflicts, especially with pre-existing operators, will be challenging for new entrants to PSH in Loch Ness. Table 16.1: The baseline data shown in Table 16.1 focusses on air temperature and precipitation. The scope for baseline data needs to be extended to include water temperatures in Loch Ness and the River Ness. Table 16.3: Climate change associated changes in precipitation are likely to result in drier summers, placing greater pressure on water resources in Loch Ness. For example, in May 2023, Loch Ness experienced a record low level, an event that appears to be associated with abstraction at Foyers PSH. This is an example of the impact of one, relatively small PSH scheme on Loch Ness, encountering water resource limitations. We ask that Glen Earrach developers produce a water resource model, including all existing and proposed water demands. This model needs to factor in climate change driven precipitation predictions.	

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108	NDSFB	6th June 2024	Meeting	Discussions regarding proposed smolt tracking studies on Loch Ness.	This meeting further informed the approach to the smolt tracking study to be submitted post-submission as part of **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. Further details can be found within the chapter.
109	NDSFB	14th and 23rd August 12th September and 21st November 2024	Meetings	Meetings to discuss the smolt tracking study.	These meetings helped to progress the approach and methodology of the smolt tracking study. The smolt tracking study has been proposed as part of **Chapter 9: Aquatic & Marine Ecology** to help understand the movement of Atlantic Salmon (*Salmo salar*) smolts within the Loch Ness catchment. The smolt tracking study will be taking place post-submission and will inform the choice of mitigation proposed for **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. Further details are provided within **Chapter 9 Aquatic & Marine Ecology (Volume 2: EIA Main Report)**.
110	NDSFB	16th December 2024	Comments on Smolt Tracking Study scope via email	I have the following comments: • VPS arrays are designed to allow smolts to be tracked with high resolution, usually at a point of interest. In this case the point of interest is the impact of effect of pump storage intakes on smolt behaviour. Our working hypothesis would be that smolts are delayed and subject to enhance mortality at pump storage intakes. This study design does not include a VPS array, which means that question cannot be answered. • The proposed multiple gate arrangement may provide some limited information on routes and speed of migration through that section of the loch but is unlikely to provide answers about the behaviour of smolts at the intake nor the impact of pumping and generation on smolt migration. • We are interested in the use of the littoral and abyssal habitat by smolts during migration through the loch and this study should provide some information on that. • 3.13 -The description of upstream and downstream reaches in a large still water such as Loch Ness is a bit misleading as surface currents are likely to be influenced by wind direction. We sometimes note large changes in the water temperature in the River Ness can occur, usually linked with a switch in wind direction from SW to NE. We think there is evidence that smolts circumvent the loch whilst trying to find the exit, in which case smolts heading east to west would be heading “upstream”. • 3.14 – I am not sure what will be learnt about migration speeds by comparing smolt in a loch environment to those in a fast-flowing river? The key thing is to try and understand the decision-making process of smolts as they approach the weir. Others have defined a “goldilocks” zone in the vicinity of loch outlets but is that split at Ness Weir with one for the weir and another for the canal?	The response has helped to progress the approach and methodology of the smolt tracking study. The smolt tracking study has been proposed as part of **Chapter 9: Aquatic & Marine Ecology** to help understand the movement of Atlantic Salmon (*Salmo salar*) smolts within the Loch Ness catchment. The smolt tracking study will be taking place post-submission and will inform the choice of mitigation proposed for **Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)**. Further details are provided within **Chapter 9 Aquatic & Marine Ecology (Volume 2: EIA Main Report).**

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				• 3.15 – What if a smolt turned back at the locks, went west and over the weir? Without more detailed study it would not be possible to be certain that smolts had actually used the smolt bypass. An efficiency assessment of that bypass is badly needed. • 3.19 – The lift gates at Ness Weir don't fall within CAR licencing so there is no publicly available information on their operation. I understand the algorithm whilst in operation, but they are sometimes open and other not. They are only required at low flows.	
111	RSPB Scotland	30th May 2024	Scoping Opinion	RSPB Scotland is supportive of renewable energy, but developments must be carefully sited to avoid negative impacts on sites, habitats and species. A strategic approach is required that will enable a balanced appraisal of the most appropriate locations for these developments that will have the least environmental impact. The proposed development area is adjacent to the Northern Inverness Lochs Species Protection Area (SPA), designated for its population of breeding Slavonian Grebe. Due to the nature of the development and its location, it would have likely significant effects on the SPA and has potential to impact on other critically important Slavonian grebe breeding lochs in the area which are linked to the SPA population. Scottish Government, as competent authority, is required by Habitat Regulations to undertake an Appropriate Assessment of the effects of the proposal on the SPA and its species in light of the sites conservation objectives. The EIA Report must include sufficient information to inform the Appropriate Assessments. If the potential impacts of the proposal cannot be sufficiently mitigated and there could be adverse impacts on the integrity of European sites it is unlikely that the proposal could be supported. Further details are provided in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	**Chapter 8: Ornithology (Volume 2: EIA Main Report)** provides the surveys and assessment on the impacts on birds of the Proposed Development. **Appendix 7.2 Statement to Inform HRA (Volume 5: Appendices)** provides the details of the Habitats Regulation Assessment conducted in relation to the North Inverness Loch SPA and other SACs and SPAs.
112	RYA Scotland	22nd May 2024	Scoping Opinion	Although Loch Ness forms part of the important and well used route for recreational and other craft between the Moray Firth and Loch Linnhe using the Caledonian Canal, the proposed scheme is not expected to have a significant impact on them. Recreational boating can thus be scoped out of the EIA.	No further action required.
113	Scottish Canals	17th June 2024	Scoping Opinion	The hydro schemes will form part of the same water cycle, which is inextricably linked to the Caledonian Canal, a scheduled ancient monument subject to the Ancient Monuments and Archaeological Areas Act 1979. This national monument is an operational asset which is protected by scheduled monument status and all potential or planned impacts upon it require careful consideration. Loch Ness itself is a key element of the route for the Caledonian Canal for which SC has a statutory navigation duty. SC is aware that the proposed development is one of four such schemes and given the shared access to the same water cycle, especially that which could affect the water levels in Loch Ness and River Ness. The design parameters and mitigation for the Glen Earrach scheme must be fully considered alongside those of the other proposed schemes. This will allow for a comprehensive appraisal of their cumulative effects on the water system, environmental impacts, and the Caledonian Canal, ensuring that all impacts are assessed as interconnected developments by the regulatory regime.	**Chapter 9: Aquatic & Marine Ecology (Volume 2: EIA Main Report)** considers the impact on fish. This included an assessment of water level fluctuations.

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				Details on SC's statutory context, duties and powers, and potential offences outlines can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** The Caledonian Canal was classified as a commercial waterway. The Caledonian Canal is a scheduled ancient monument and subject to the Ancient Monuments and Archaeological Areas Act 1979. We note that SC has not been consulted in the preparation of the scoping report. We therefore request that SC is consulted fully during the preparation of the Environmental Impact Assessment (EIA). SC welcomes that the Caledonian Canal is referred to on four occasions in the scoping report regarding transportation of large items of equipment during the construction phase, the impacts on fish passage at Ness Weir at the northern end of Loch Ness and the water level fluctuations in Loch Ness and water supply to the Caledonian Canal (Sections 2.7.2.2, 7.7, 10.7.1 and 11.4.1.1 respectively). <u>Aquatic Ecology, including marine ecology</u> SC welcomes the recognition that potential solutions to mitigate impact to fish passage on Loch Ness, Ness Weir and the Caledonian Canal would need to be future proofed to take into account cumulative effects and the potential impacts of climate change thereby delivering the National Planning Framework Policy Principles to ensure that Blue Green infrastructure delivers multiple environmental functions and associated benefits. SC requests that water level fluctuations as well as changes to water flow patterns in combination with greater variation in level changes around the Caledonian Canal assets are considered in the EIA. Preliminary doppler surveys by the Scottish Environment Protection Agency indicate that the flow patterns at Ness Weir and the approaches to Dochgarroch Lock change with varying Loch Ness levels. SC requests that the significance of potentially altered water flow patterns, due to the Proposed Development in combination with other pumped storage hydro schemes, on the upstream and downstream migration of salmonids and other migratory fish including eels and lamprey species in the Ness Weir and Dochgarroch areas, is reviewed and mitigation proposed as required. Currently Scottish Canals has a smolt sluice adjacent to the Dochgarroch Lock which must be fully operational between 1st April to 1 July annually to facilitate for the movement of salmon smolts from the entrance of the canal at Loch Dochfour back to the River Ness. The assessment should consider the impact of fluctuating water levels on the efficacy of the smolt sluice and the fish pass within the Ness Weir.	
114	Scottish Canals	17th June 2024	Scoping Opinion	<u>Geology and ground conditions</u> SC requests that the potential impact of fluctuating water levels on Caledonian Canal operations regarding the available navigable depth is included in the EIA. Sediment deposition from uncontrolled river discharges creates deltas in the canal near Dochgarroch, with the Dochfour Burn posing a navigation hazard during normal water levels. Fluctuating Loch Dochfour levels may increase the need for more frequent dredging. A stilling basin upstream of the discharge point on the Dochfour Burn should be assessed as a potential solution to manage sediment build-up at low water levels.	Though in the response this references Geology and Ground conditions for the purposes of the assessment the receptor would be considered in **Chapter 15: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)**. The Dochfour Weir is considered within mitigation for a number of sections and is

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				Water Environment SC welcomes the consideration of potential for adverse impacts on the water environment due to construction of a temporary dock in Loch Ness to facilitate the use of the Caledonian Canal as a transport route during the construction phase. Please also note the comments on Access, Traffic and Transport.	outlined within **Appendix 19.1 Mitigation Register (Volume 5: Appendices)**.
115	Scottish Canals	17th June 2024	Scoping Opinion	Flood risk and water resources SC notes that Loch Ness is identified in the scoping report as a water source for the northern section of the Caledonian Canal. The provision of sufficient water resources is fundamental to the safe operation of the Caledonian Canal and preservation of the scheduled heritage assets . Any proposed reduction (under provision compared to historic flows) of water to the canal is likely to seriously compromise the ability to maintain navigable status as required by statute. Any alterations from the developments which may result in over provision of water presents risks to the several aging engineered assets and levels to which engineered assets are designed. The developments could potentially impact by resulting in water levels on Loch Ness and adjacent canal, which could exceed canal design parameters, presenting risks of infrastructure failure and /or overtopping and flooding. It is therefore imperative that the projected impacts of climate change are included in the hydrological modelling for all proposed and current pumped storage schemes on Loch Ness and that this considers the navigation function, recreational value, and potential asset fatigue of the Caledonian Canal where it interfaces with Loch Ness at Fort Augustus, Ness Weir, and Dochgarroch Lock. We also request that the impact of licensed water use at Dochgarroch Lock is flow considered in the EIA. SC will be able to provide information relating to modelling Dochgarroch loch. SC requires further information on the impact of the scheme not only on Loch Ness water levels, but also, the water flow regimes in the vicinity of our operational assets and reservoirs and any potential increased asset fatigue now, and in the future, based on UK projected climate change impacts. In addition, the impacts of fluctuating water levels on lock operations by both operational and non-SC staff needs to be considered.	Hydraulic modelling of water levels and flows has been carried out within **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**. The In-Combination Climate Change (ICCC) assessment provides an assessment of the impact on water levels and flow regimes when considering the projected effects of climate change. Details on the methodology is reported in Chapter 17: Climate (Volume 2: EIA Main Report). The ICCC for each topic is reported within the relevant chapter **(Chapters 6-18 (Volume 2: EIA Main Report)**. The impacts on navigational abilities within the Caledonian canal is considered as part of **Chapter 16: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)**.
116	Scottish Canals	17th June 2024	Scoping Opinion	Cultural heritage SC requests that the scope of the EIA includes the potential impact on the Caledonian Canal's operational assets at Fort Augustus, Ness Weir, and Dochgarroch Lock. SC requests that if the scope of the development extends to include changes to the operation and/or structure of canal assets that this is included in any updates to the cultural heritage impact assessment following full consultation with SC and Historic Environment Scotland.	**Chapter 12: Cultural Heritage (Volume 2: EIA Main Report)** considers the effects on heritage assets, including on the scheduled monument the Caledonian Canal. The in-combination climate change assessment considers the impact of climate change to heritage assets and is also reported within the chapter.

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				The assessment should include details of how the developer will ensure that the historic, protected canal structures affected by the Proposed Development are resilient, now and in the future, to projected climate change impacts. SC also wishes to advise that there is a process for any third party works to our structures. If required, all interfaces with the canal, including construction methodologies adjacent to the canal structure, will require Scottish Canals Third Party Works (TPW) approval.	
117	Scottish Canals	17th June 2024	Scoping Opinion	<u>Access, Traffic and Transport</u> SC recognises the significant opportunity for the proposed development to use the Caledonian Canal for a variety of freight purposes. Scottish Canals supported trial passages of water-based freight in relation to the Coire Glas pumped storage hydro scheme development on Loch Lochy in late 2022. Use of the canal to support hydro related transport can significantly reduce the number of abnormal indivisible loads on the already congested A82 and wider highland road network. We note that the use of water borne freight has the potential to reduce the transport carbon emissions during the construction phase of the Proposed Development and request that this is included in the carbon balance assessment. A Canal Management Plan should be also produced in collaboration with SC and other stakeholders to ensure that the operation does not adversely affect existing leisure and commercial canal traffic. Significant investment in canal infrastructure and associated facilities will be required to ensure that the Caledonian Canal plays a full role in the hydro schemes in the Great Glen.	The use of water-borne freight is considered within **Chapter 13: Access, Traffic and Transport (Volume 2: EIA Main Report).**
118	Scottish Canals	17th June 2024	Scoping Opinion	<u>Socio-economics, Recreation and Tourism</u> SC requests that the potential impact of access to existing Caledonian Canal leisure and commercial moorings, including jetties and wharves around Loch Ness is included in the EIA. SC requests that hydrological assessments, which take account of projected climate change impacts, assess the potential impacts of the Proposed Development on the use of existing Caledonian Canal operations, boat access and egress and infrastructure. This should pay particular attention to the requirements to ensure that vessels can be securely and safely tied to fixed berths and left unattended if Loch Ness levels fluctuate regularly without notice. SC requests the assessment of the potential conflict of the proposed development construction canal traffic with those engaged in water based recreational activities on Loch Ness and the Caledonian Canal and requests that a Canal Management Plan to be developed to manage any potential issues. It is imperative that adequate focus is given to assessing the potential negative impact that this and other	An assessment on the impact to the Caledonian Canal as a socio-economic receptor is included within **Chapter 16: Socio-Economic, Recreation and Tourism (Volume 2: EIA Main Report)**. Projected climate change projections are included as part of hydrological assessments within the In-Combination Climate Change Assessment for **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)**.

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				schemes may have on tourism businesses and the local communities whose prosperity relies on them along the Caledonian Canal.	
119	Scottish Gas Networks	15th May 2024	Scoping Opinion	SGN do not have any High-Pressure assets within the vicinity of the above and as such would have no objection/comment.	No response required.
120	Scottish Water	29th May 2024	Scoping Opinion	Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced. Please read the following carefully as there may be further action required. Scottish Water would advise the following: The applicant should be aware that we are unable to reserve at our water and/or wastewater treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.	No further action required as part of the EIAR.
121	Scottish Water	29th May 2024	Scoping Opinion	<u>Drinking Water Protected Areas</u> A review of our records indicates that the proposed activity falls within a drinking water catchment where a Scottish Water abstraction is located. Scottish Water abstractions are designated as Drinking Water Protected Areas (DWPA) under Article 7 of the Water Framework Directive. Loch Ness supplies Invermoriston Water Treatment Works (WTW) and it is essential that water quality and water quantity in the area are protected. Loch Ness has a large catchment (1781km²), with the proposed development located between Drumnadrochit and Invermoriston on the northern shore. The development has a lower rate of change per GWh compared to other schemes. While its storage capacity is greater, the operation of Glen Earrach PSH must not lower loch levels to the point where forward flow over Ness Weir or the head over Invermoriston RWI is impacted. If these conditions are met, the development would have a low impact on the water resources of the Loch Ness catchment, which is in surplus. The activity could present a risk to water quality and therefore the appropriate mitigations for pollution prevention must be in place. Scottish Water have produced a list of precautions for a range of activities. This details protection measures to be taken within a DWPA, the wider drinking water catchment and if there are assets in the area. Note that site specific risks and mitigation measures will require to be assessed and implemented. We welcome receipt of this notification about the proposed activity within a drinking water catchments where Scottish Water abstractions are located. The fact that this area is located within a drinking water catchment should be noted in future documentation. Also, anyone working on site should be made aware of this during site inductions. We would appreciate further consultation as this development progresses. It would be useful to know the anticipated start date for the development if this gets planning consent so we	**Chapter 10: Water Environment** and **Chapter 11: Flood Risk & Water Resources (Volume 2: EIA Main Report)** provide an assessment of the water level and flow changes and potential impacts on the water environment and resources

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				can make our operational teams aware, given that there are similar activities taking place in this catchment which could present and aggregate of issues.	
122	Scottish Water	29th May 2024	Scoping Opinion	Surface Water For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system. There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges. In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives. General notes: Scottish Water asset plans can be obtained from our appointed asset plan providers. Details on contacting them or Scottish Water about any other points can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude. Scottish Water may only vest new water or wastewater infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer. The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.	**Chapter 10: Water Environment** and **Chapter 11 Flood Risk & Water Resources (Volume 2: EIA Main Report)** provide an assessment of the water level and flow changes and potential impacts on the water environment and resources.
123	Scottish Water	29th May 2024	Scoping Opinion	All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals. Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations. The water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and wastewater connections.	No further action required as part of the EIAR.

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				Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from a range of activities and covers both large and small premises. Contact Scottish Water to determine if discharge from your premises is trade effluent. Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off. Waste for food services establishments and non-rural food businesses must follow other standards, found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).**	
124	ScotWays	12th June 2024	Scoping Opinion	See **Appendix 4.2 Scoping Opinion (Volume 5: Appendices)** for maps referenced. The enclosed map shows that rights of way HI48, HI49 and HI67 as recorded in the National Catalogue of Rights of Way (CROW) cross or are close to the application site as shown on Figures 1-1 Site Location Plan. The enclosed map shows other paths HI52, HI53 and HI63 as recorded in the CROW cross or are close to the application site as show on Figure 1-1 Site Location Plan. In searching our records at this scoping stage, we have focussed solely on the immediate area of the proposed application. If required by the applicant to inform their EIA, maps of a wider search area available from ScotWays, alongside a more detailed response. You should be aware that other forms of public access to land may affect the planning application site. More detail about these other types of access is set out in the enclosed Catalogue of Rights of Way Guidance Notes. The Affric Kintail Way and the Great Glen Way (promoted by NatureScot as one of Scotland's Great Trails) are long distance routes within the site. ScotWays also has an interest in impacts on recreational amenity and the impact of developments on the wider landscape. We expect the applicant to consider these in their proposals and will review them further if a planning application follows. At this scoping stage the recreational baseline is incomplete: the applicant still needs to assess the effect of this proposed development on routes across the application site. Figures 5-4, 1-2, and 1-3 need to be checked for their representation of core paths. Specific details can be found in **Appendix 4.2 Scoping Opinion (Volume 5: Appendices).** In addressing mitigation measures for the site, 15.9 Potential Mitigation Measures, the applicant states 'The CEMP will be supported by a Recreation and Access plan, this will likely aim to mitigate any access disruption or impacts on amenity caused to the Core Paths and other notable walking routes caused by closure and other construction or operation related disruption.' Access tracks within the site use rights of way HI48, HI49, and other routes HI52, HI53, and HI63, which haven't been considered by the applicant. The impacts on these routes should be assessed, and the applicant should consult with The Highland Council's access team for the Recreation and Access Plan.	The impacts on the receptors identified by ScotWays are considered in **Chapter 16: Socio-Economics, Recreation and Tourism (Volume 2: EIA Main Report)**. The effects on the amenity of tourism and recreational receptors are considered in **Chapter 6: Landscape and Visual Assessment** and **Chapter 14: Noise and Vibration (Volume 2: EIA Main Report)**.

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				Under section 3 of the Land Reform (Scotland) Act 2003, there is a duty upon landowners to use and manage land responsibly in a way which respects public access rights, and access authorities uphold these rights under section 14. Accordingly, we suggest that the applicant may wish to approach the relevant authority's access team for their input when drawing up their Access Management Plan for their proposed development.	
125	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	The lack of consultation with the community is very concerning. Despite stating on the developers website 'We are committed to seeking the community's views on how best to integrate the project into the environment and the community.' The only consultation took place in Drumnadrochit, which is 31 miles away by road and would take about an hour to get there from the Village of Foyers which will be one of the most affected areas and is under 1 mile from the scheme. It was also held during working hours.	Early engagement events were held in Balnain, Invermoriston and Foyers in August and September 2024. Subsequently, pre-application consultation events were held in in October and November in Drumnadrochit, Foyers, Invermoriston and Balnain The events were held at various times between 10am and 8pm to allow as many members of the public to attend as possible. In addition, an online consultation room was displayed on the project website which provided a further opportunity for the community to review consultation material and to provide feedback. Further details on engagement with the local community can be found in the PAC report.
126	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Noise and dust; concern about the noise and dust levels in Foyers and Inverfarigaig as they are directly across the Loch from the site and under 1 mile away from it. An assessment of the impact of dust has been scoped out. This must be included in the EIA. Boleskine, Inverfarigaig and Dores should be added as sites for consideration of the impacts of noise, vibration and dust.	Details of the noise assessment is available in **Chapter 12: Noise & Vibration (Volume 2: EIA Main Report)**. No significant air quality effects are anticipated as emissions to air are restricted to construction plan and construction dust, which can both be mitigated through good practice measures/ A dust management plan is provided in the oCEMP **Appendix 3.1 Outline Construction Environmental Management Plan (Volume 5: Appendices)**.
127	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Visual impact will be huge, especially during construction for the South side of Loch Ness. At 15.4.2 under socio-economics it states: Loch Ness Shores Camping and Caravanning Club site is located 1.6 km east of the Development on the opposite side of Loch Ness, along with several holiday rental properties. But makes no mention at all and completely downplays the impact on numerous other locations detailed in Appendix **4.2 Scoping Opinion (Volume 5: Appendices).**	An assessment of visual impacts is in **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)**. This includes an assessment of visual impacts on representative viewpoints at Foyers.

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				Diagram 5.4 shows what looks like there will be visualisations from Upper and Lower Foyers. Hard to tell exactly where they will be done from as map is blurry when you zoom in but if visualisations from Boleskine and Inverfarigaig can also be added to that list.	
128	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Access off the A82; this will have a huge impact on transport on this major trunk road which could also affect the B862 as local people travelling from Inverness to Fort Augustus or Fort William will use that side of the loch to avoid any delays on the A82. Turning on and off the A82 will also be hazardous.	An assessment of the impacts on the local road network is in **Chapter 13: Access, Traffic & Transport (Volume 2: EIA Main Report)**.
129	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Cumulative effect on Loch Ness; with Foyers PSH, that was passed in the 70's, when we knew a lot less about potential environmental damage, Loch Na Cathrach (previously Red John) consented and Loch Kemp in planning, at what point will the cumulative effect on Loch Ness be considered. There are very concerning reports about what effect PSH will have on aquatic life in Loch Ness and there is also the fact that it is arguably the most famous Loch in the world and a scheduled monument. Turning the whole of the loch into a construction site will have an impact on tourism and have a negative effect on the economy.	Cumulative effects have been considered for each of the environmental topics and take into account any existing environmental problems and any areas of particular environmental importance such as designated sites and landscapes. The cumulative assessment also considers the effects between the different environmental topics (intra-project effects) for the Development as well as the effects from other projects (inter-project effects). The cumulative impacts of Foyers PSH (existing), Loch na Cathrach PSH (consented) and Loch Kemp PSH (submitted S36 application) are considered. **Chapter 4: Approach to EIA (Volume 2: EIA Main Report)** contains a list of the cumulative developments considered.
130	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Effect on water levels; Visualisations should include views which show Loch Ness at its lowest permissible level with the cumulative 1m to 1.2m impoverished littoral zone above it that would be created by all the proposed and consented schemes operating simultaneously.	The assessment of visual impacts is included within **Chapter 6: Landscape and Visual (Volume 2: EIA Main Report)** the methodology of which has been agreed through consultation with THC's Landscape Officer.
131	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Figure 11.2 shows the whole of Inverness as a vulnerable area; is this for potential flooding? Also to note on that drawing, Red John PSH is now named Loch Na Cathrach PSH.	Inverness is identified by SEPA as being within a Potential Vulnerable Area for flooding.
132	Stratherrick Foyers Community Council	& 17th December 2024	Scoping Opinion	Effect on the Great Glen Way; this is a very popular walking route linking Inverness to Fort William and then joining the West Highland Way or the Loch Ness 360. The proposed site goes right through this path.	The impact on the Great Glen Way will be assessed within **Chapter 16 Socio-Economic, Recreation and Tourism (Volume 2: EIA Main Report)** and **Chapter**

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					6: Landscape and Visual (Volume 2: EIA Main Report).
133	Stratherrick & Foyers Community Council	17th December 2024	Scoping Opinion	Given the recent discovery of SSSI-quality habitats nearby, the ecological desktop studies require augmentation with lichen (both terrestrial and fresh-water) and bryophyte field surveys to establish whether such habitats are present within the development and inform the content of the EIA.	A Phase 1 Habitat Survey and National Vegetation Classification Survey have been carried out to determine the potential effects of the Proposed Development on important ecological features. The results of these surveys as well as the impact of the Proposed Development on identified receptors are set out in **Chapter 7 Terrestrial Ecology (Volume 2: EIA Main Report)**.
134	Stratherrick & Foyers Community Council	17th December 2024	Scoping Opinion	Ensure consideration of Stratherrick and Foyers Local Place Plan.	**Chapter 5: Planning Policy (Volume 2: EIA Main Report)** and the Planning Statement accompanying the section 36 application summarise the national, regional, and local planning policy guidance and development plan policies that are relevant to the Proposed Development
135	Woodland Trust	15th May 2024	Scoping Opinion	At present, our Campaigning Team receives over 1,000 enquiries a year relating to a wide variety of issues, with only a small team of people able to respond. As such, we employ a level or triaging and prioritisation for enquiries, primarily focusing on those concerning ancient woods and ancient and veteran trees. In the interests of making sure that you have the help and guidance necessary to answer your enquiry, we ask that you consider the information below: Threats to woods and trees - in the vast majority of cases, your local Council / Planning Authority should be the first point of contact where local woods and trees are threatened – ancient, veteran or otherwise. We would always suggest urgently contacting them first about a threat to woods and trees in your locality. They may be able to help you secure a Tree Preservation Order (TPO) or address any urgent threats. Ancient woods or veteran trees – where your concern involves a threat to ancient woodland or veteran trees, we ask that you please use the Report a Threat form on our website, so we have the information to help you: Report a threat (woodlandtrust.org.uk) Individual or garden tree felling – if you are concerned that there may be an imminent threat to trees from unauthorised felling, please contact the Council's Planning Enforcement team and their Tree/Arboricultural Officer. Our guidance on tree felling rules provides more information: Cutting Down Trees: Law & Legislation - Woodland Trust	Woodland and forestry have been considered in **Chapter 7: Terrestrial Ecology (Volume 2; EIA Main Report)** and **Chapter 18: Forestry (Volume 2: EIA Main Report).**

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				Woodland felling – if you are concerned that unauthorised felling might be taking place, please contact the Council's Planning Enforcement team and their Tree/Arboricultural Officer. If the felling is on a large scale, you can find out from the Forestry Commission (in England), NaturalResources Wales, Scottish Forestry or the Northern Ireland Forest Service whether a felling licence is in place. Our guidance on tree felling rules provides more information: Cutting Down Trees: Law & Legislation - Woodland Trust Planning applications – if you are concerned about a planning application that does not impact ancient woodland, veteran trees or a Woodland Trust wood, but could still affect other important habitats, you may want to use our online resources or consider contacting another local nature conservation charity, such as your local Wildlife Trust or CPRE. Planning permission granted – if you are concerned about works taking place after planning permission is granted, please contact the Council's Planning Enforcement team and their Tree/Arboricultural Officer.	

Glen Earrach AECOM