Agenda Item	**6.1**
Report No	**PLS-07-25**

HIGHLAND COUNCIL

Committee: South Planning Applications Committee

Date: 06 February 2025

Report Title: 24/01056/S36: Earba Limited

Land 4200m SE of Moy Lodge, Tulloch, Roy Bridge

Report By: Area Planning Manager – South

Purpose/Executive Summary

Description: Earba Pumped Storage Hydroelectric Scheme - Construction and operation of a pumped storage hydroelectric scheme with a generating capacity of 1,800MW and a 40GWh storage capacity

Ward: 20 – Badenoch and Strathspey

Development category: National Development (Section 36 Application)

Reason referred to Committee: Section 36 Application

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is unacceptable in terms of applicable material considerations.

Recommendation

It is recommended that the Council **RAISE NO OBJECTION** to the proposal as set out in section 11 of the report.

1. PROPOSED DEVELOPMENT

1.1 The Highland Council has been consulted by the Scottish Government's Energy Consents Unit (ECU) on an application made under Section 36 of the Electricity Act 1989 (as amended) for the construction and permanent operation of Loch Earba pumped hydro storage scheme and associated infrastructure. The application is for the construction and operation of a pumped storage hydro scheme with an installed capacity of up to 1800MW and a generation energy storage capacity of up to 40 Gigawatt Hours (GWh). The proposed development would operate by transferring water between a lower reservoir, Lochan na h-Earba (Loch Earba) and an upper reservoir, Loch a' Bhealaich Leamhain (Loch Leamhain). The maximum water level of these existing lochs would be raised by constructing dams to increase their natural storage capacity. The reservoirs would be connected by an underground waterway system including up to three headrace tunnels.

1.2 Key elements of the development, as described and assessed within the proposals and the Environmental Impact Assessment Report (EIAR) include:

- Leamhain Dam and upper reservoir;
- Shuas Dam, Shios Dam and lower reservoir;
- Underground waterway system and associated structures;
- Powerhouse and indoor electrical switchyard;
- Pitridh and Shuas Aqueducts;
- New junction from the A86 and bridge over the River Spean/Moy Channel;
- Approximately 27km of new tracks and 6km of upgraded tracks;
- Approximately 5.9km of new paths and 1km of upgraded paths;
- Upgraded/new access tracks and footpaths;
- 9 site compounds and worker facilities;
- 5 Borrow Pits;
- 23 new watercourse crossings and 1 upgraded crossing;
- Landscaping and earthworks;
- Tree planting, peat and habitat compensation/enhancement; and
- Approximately 20km of deer fencing.

1.3 Due to the installed capacity, this proposal falls under the provisions of the Electricity Act 1989 and is classed as National Development by National Planning Framework 4 (NPF4).

1.4 A grid connection comprising a buried 400kV cable and substation adjacent to the Beauly to Denny overhead transmission line is required to connect the proposed development to the national electricity grid. For regulatory reasons, this will be subject to a separate consenting process with Scottish and Southern Electricity Networks Transmission as the applicant. It is anticipated that this would be a buried cable

connection, however, as is common for renewable energy projects, the form of connection, routing and any associated infrastructure requirements are yet to be confirmed by SSEN Transmission.

1.5 A micro-siting allowance has been proposed by the applicant around the Shuas Dam of 50m to the south east and 100m north east to accommodate unknown ground conditions. The final detailed design of the Leamhain Dam, Shuas Dam, Shios Dams, powerhouse, substation, Pitridh and Shuas Aqueducts, compounds, worker facilities, tracks, paths, watercourse crossings, borrowpits, landscaping, earthworks, ancillary equipment, fencing etc. are also expected to be agreed with the Planning Authority, by condition, at the time of project procurement. This will allow for some flexibility on the approved design details given manufacturers regularly update the specification of equipment and designs that are available, thereby necessitating the need for some flexibility albeit such refinement would require to remain within the parameters of the description of development applied for and the Environmental Impact Assessment undertaken.

1.6 Whilst public consultation for Section 36 applications is not mandatory, the applicant held two rounds of public exhibitions to seek the views of the local community on 21 February 2023 followed by 21 November 2023 at Laggan Community Hall and 22 February 2023 followed by Wednesday 22 November 2023 at Spean Bridge Community Centre. Event notifications were advertised in the Inverness Courier and Strathspey and Badenoch Herald along with a letter drop to all properties within 10km of the site boundary. A Pre-application Consultation Report accompanied the application that set out how public consultation has informed the submitted proposal. In addition, the applicant has attended a number of Community Council meetings:

- Spean Bridge Roy Bridge and Achnacharry Community Council on 4 April 2023. The applicant provided a presentation of the project and answered questions.
- Laggan Community Council on 15 May 2023. The applicant provided a presentation of the project, answered questions and requested feedback from on proposed visualisation locations.
- Spean Bridge Roy Bridge and Achnacharry Community Council on 2 April 2024. The applicant provided a presentation of the S36 application and answered questions.
- Laggan Community Council on 20 May 2024. The applicant provided a presentation of the S36 application and answered questions.
- Dalwhinnie Community Council 25 June 2024. The applicant provided a presentation of the S36 application and answered questions.
- Spean Bridge Roy Bridge and Achnacharry Community Council on 3 September 2024. The applicant provided a response to their letter of concern and presented the proposed community benefit package.
- Dalwhinnie Community Council on 10 September. The applicant provided a response to their objection and presented the proposed community benefit package.
- Laggan Community Council 16 September. The applicant provided a response to their objection and presented the proposed community benefit package.

- Newtonmore Community Council 4 November 2024. The applicant provided a presentation of the S36 application and answered questions.

1.7 The applicant made use of the Council's Pre-Application Advice Service for Major Developments in February 2023 (22/05962/PREMAJ). The major pre-application response summarised the key issues noting that pumped storage hydroelectric schemes are national developments, identified in National Planning Framework 4, therefore, the need for such projects is established. Highland Council is supportive of renewable energy developments and its supporting infrastructure where it can be appropriately sited and designed to not be significantly detrimental overall, either individually or cumulatively with other developments. Consequently, the Council gave a level of qualified support for the proposal if matters identified within the major pre-application response could be appropriately addressed with further information provided with the future application. These included:

- Impacts upon the Ben Alder, Laggan and Glen Banchor Special Landscape Area and the Rannoch-Nevis-Mamores-Alder Wild Land Area (WLA 14) both in isolation and cumulatively with other schemes. It was noted that the future application was to be accompanied by suitable visualisations covering the construction phase along with various phases after completion to consider the worst case scenario. A mitigation strategy was required with regards to design, materials, landscaping and ongoing maintenance.
- Phasing of development with plans showing exploratory works, enabling works and final construction works.
- Compensatory planting scheme, Arboricultural Impact Assessment and Tree Protection Plan.
- Draft Peat Management Plan.
- Biodiversity Enhancement and Management Plan.
- Construction Traffic Management Plan.
- Outdoor Access Management Plan.
- Flood Risk Assessment, Drainage Impact Assessment with impacts on Ground Water Dependant Terrestrial Ecosystems considered.
- Address pollution and amenity impacts.
- Heritage walkover survey.

1.8 The application is supported by an EIAR, the contents of which has been informed through an EIA Scoping exercise. The EIA Scoping Report was submitted with a request for an EIA Scoping Opinion to the Energy Consents Unit on 30 January 2023. A Scoping Opinion was issued on 27 April 2023. The EIAR contains chapters covering: an introduction to the proposed development; consideration of alternatives and design evolution; assessment methodology, scoping and consultation; planning and energy policy; hydrology and water management; landscape and visual; terrestrial ecology; forestry; ornithology; aquatic ecology; geology, soils and water; land use; recreation and access; transport; noise and vibration; socio-economic; mitigation schedule. The application is also accompanied by a Planning Statement and the Pre-Application Consultation (PAC) Report.

2. SITE DESCRIPTION

2.1 The proposed development is located within Ardverikie Estate south of Loch Laggan between Newtonmore and Spean Bridge. The Estate extends across approximately 38,000ha and used for a variety of highland sports, outdoor recreation, commercial forestry, hydroelectric generation (there are two existing small scale reservoir storage hydro schemes), holiday accommodation and film location. The site comprises predominantly wet heath, with some smaller areas of blanket bog, dry heath, mire, woodland and scrub. There is a small area of scheduled ancient woodland along the shore of Loch Earba.

2.2 The proposed development site measures 2,086ha. The landscape comprises a mixture of forested slopes rising from the loch shore into a complex structure of rocky crags and knolls which then transitions into a more remote upland landscape of large mountain masses with sweeping moorland valleys filled with burns and lochs.

2.3 Loch Leamhain, which would comprise the upper reservoir, is located within a bowl-shaped corrie set within the prominent summits of Creag Pitridh, Geal Charn and Beinn a' Chlachair. Vegetation is predominantly heather moorland along with areas of exposed rock, crag and scree, particularly on higher ground.

2.4 Lochan Earba, which would comprise the lower reservoir, would be located within a hollowed out U-shaped valley characterised by the two separate lochs of Lochan Earba and contained by rough, rocky crags to north and south. This area has a smaller-scale, more enclosed and intimate feel with existing tracks and small weirs present on the lochs. Slopes surrounding Loch Earba are covered by rough grassland, with scattered mature trees accommodating a range of species.

2.5 The wider setting generally consists of remote upland with settlements concentrated around Loch Laggan and the A86 to the north of the proposed development. Hydro development is an existing feature within the wider landscape with River Pattack, Loch Laggan and Loch Ericht hydro schemes within the area. However, these are at a significantly smaller scale and capacity than the proposed development. The area is also popular for a variety of recreational pursuits with a number of tracks and paths leading through the valleys and towards the surrounding mountain summits.

2.6 The site is in a remote sparsely populated area with the closest residential property being 3.6km from the proposed pump turbine. Eight properties are also located within 500m of the proposed new junction on the U1667 Ardachy Road. Additionally, a small number of dispersed buildings are located along the A86 and set back from the Trunk Road; the closest of these are Luiblea and Tòrgulbin approximately 285m and 325m to the west and south west respectively of the proposed access. Moy Cottage approximately 645m and Moy Lodge 685m respectively either side of the A86 to the north east. The closest main settlement is Kinloch Laggan located approximately 5km to the north east of proposed development.

2.7 The key recreational interests in the area include walking and cycling but also mountaineering, and rock climbing. There are a number of tracks intersecting the site with Scottish Hill Tracks (153, 154 and 155) beyond the site boundary to the east. The unofficial long-distance walk between Fort William and Aviemore and the East Highland Way generally passes to the north of the proposed development and

overlaps at the access from the A86 at the north eastern end of the site by the Shios Dam. Surrounding Munros include Beinn a Chlachair, Geal Charn and Creag Pitridh (with these 3 summits linked by a popular route) along with Grahams Binnein Shuas and Binnein Shios. On the southeast face of Binnein Shuas there are cliffs which host Adverikie Wall, a popular rock climbing route. The stalkers' path over the Bealach Leamhain between the south western end of Loch Earba and Loch Pattack is also used by mountain bikers, along with the Badger Divide bikepacking route between Glasgow and Inverness to the south of Loch Earba.

Environmental Designations, Habitats and Ornithology

2.8 The site does not form part of any statutory or non-statutory designated sites for nature conservation. Designated sites for ecology and ornithology within 10km of the site include:

Designation	Distance to Site Boundary (Approximate)	Qualifying Interests
The Creag Meagaidh SSSI / SAC / SPA	0.3km north	Breeding birds, upland habitat, upland birch woodland and vascular plants
The Creag Meagaidh NNR	0.3km north	Protected for various species including dotterel, ring ouzel. golden plover, ptarmigan, golden eagle, peregrine falcon
The Ben Alder and Aonach Beag SSSI / SAC	0.3km south east	Breeding birds, upland habitat assemblage including blanket bog, bryophyte, lichen, vascular plants and Dalradian outcrops

2.9 The proposed site includes 5.35ha of trees recorded as ancient woodland in the Ancient Woodland Inventory (AWI) which is classified as Ancient (of semi-natural origin) set back from the eastern shore of the more northerly Loch Earba (ASNO1860).

2.10 Terrestrial site surveys detected evidence of protected species including: common frog, common lizard, protected species across otter, water vole, red squirrel, pine marten, bat and deer. Aquatic site surveys detected evidence of Arctic charr and brown trout. The site and surrounds have been surveyed for breeding birds and transient birds with evidence of ring ouzel, snipe, teal, common sandpiper, golden eagle, black-throated diver, red-throated diver and black grouse.

2.11 Areas identified as being potentially moderately groundwater dependent are likely to be sustained by incident rainfall and local surface water runoff rather than by groundwater.

2.12 The principal soil types recorded at the site include peat, peaty gleys, peaty podzols and peaty rankers with lithosols. Areas of humus iron podzols are recorded near the River Spean and alpine to sub alpine podzols are noted on higher and steeper ground.

Class 1 and 2 peatlands which are defined as nationally important carbon rich soils, deep peat, and priority peatland habitat of high conservation value are found to the south west of Loch Earba and east of Loch Leamhain. A small area of Class 2 peatland is also noted on the north eastern slopes of Binnein Shuas. Peat depth surveys recorded varying depths of peat under 1m in approximately 85% of peat probes.

Landscape Designations, Wild Land and Landscape Character

2.13 The proposed development is located within a regional landscape designation, Glen Banchor Special Landscape Area (SLA). It also forms part of Wild Land Area 14 - Rannoch-Nevis-Mamores-Alder which covers the vast majority of the site apart from a section of the access track from the A86 and Ben Alder, Laggan. Landscape designations within a 45km study area are tabled below.

Designated Landscape	**Distance and direction from the proposed development**
National Park	
Cairngorms	3.5km to north east
Special Landscape Area (SLA)	
Ben Alder, Laggan and Glen Banchor	Within the site boundary
Wild Land Areas (WLA)	
14 - Rannoch-Nevis-Mamores-Alder	Within the site boundary

2.14 The proposed site boundary will be located across 5 different Landscape Character Types (LCT) - LCT 85: Isolated Mountain Plateau extends into the higher ground encompassing Loch Leamhain along with Munros Creag Pitridh, Beinn a Chlachair and Carn Dearg, LCT 86: Smooth Rounded Hills - Badenoch and Strathspey extends along the site access towards the south western end of Loch Earba, LCT 87: Small Craggy Knolls and Hills covers the full extent of Loch Earba and beyond the northern shoreline, LCT 89: Broad Loch and Glen marginally extends towards the A86 and a portion of the access into the site and LCT 235: Broad Forested Strath covers a very small portion of the internal access.

Built Heritage

2.15 There are no statutory designations within the site boundary. The proposed development would be situated in an area containing few archaeological sites or areas of historical interest. Within the wider area of Loch Laggan there are a number of cultural heritage sites of national importance with statutory protection, however, there is no theoretical visibility of the proposed development at these locations and have been scoped out of this assessment. During site surveys the non-designated shieling group and cairn, sheep enclosure and shieling group and the Estate roads and bridges were assessed within the proposed development site. The potential for further as yet unidentified archaeological sites to be located within the development area is

considered to be very low.

Hydrology

2.16 The Proposed Development is located wholly within the surface water catchment of Lower Loch Laggan. Loch Laggan is located approximately 1.5km north of the proposed development. The outfall of the loch forms the River Spean which flows through the north western extent of the site and continues to flow south westwards. The site is drained by the various sub catchments of Loch Laggan and the River Spean.

2.17 SEPA flood maps confirm fluvial flooding within the site. Flood extents are typically small and are limited to close to the banks of watercourses and lochs. A larger extent of flooding is noted immediately upstream of Loch Earba near the confluence of Allt Coire a'Chlachair and Allt Coire Pitridh, between the two existing lochans and beneath the footprint of the temporary compound proposed in this area. SEPA flood maps also confirm that surface water flood extents largely coincide with watercourses and lochs within the site.

Cumulative Development

2.18 EIAR assessing details of operational, consented/under construction, and in planning hydro projects within the 10km study area. These include Corrievarkie pumped hydro storage scheme at the southern end of Loch Ericht currently at Scoping stage and the replacement weir and change to inundation levels on Loch Ossian consented in November 2022.

3. PLANNING HISTORY

3.1	23.09.2023	23/03118/PAN - Construction of a pumped storage hydroelectric scheme of up to 1500 megawatts generation capacity and 40 gigawatt hours storage capacity	Reported to South Planning Applications Committee
3.2	01.04.2023	23/00810/SCOP - Request for scoping opinion for proposed section 36 application for Earba pumped storage hydro.	Scoping Response Issued

4. PUBLIC PARTICIPATION

4.1 Advertised: Section 36 Application and EIA Development

Date advertised:

- The Strathspey and Badenoch Herald - 14 and 21 March 2024
- The Inverness Courier - 15 and 22 March 2024
- The Herald – 18 March 2024
- Edinburgh Gazette – 18 March 2024

Representation Deadline: 2 February 2024

Representations Received by The Highland Council: 3 representations (2 objections

and 1 general comment)

Representations Received by The Energy Consents Unit: 16 representations (16 objections)

4.2 Material considerations raised in objections are summarised as follows:

- Not in accordance with the Development Plan;
- Landscape and visual impact;
- Impact on landscape and natural heritage designations;
- Varying water levels and drawdown scars;
- Landscape and visual impact of access tracks;
- Impact on habitat, species and ecology;
- Impact on tourism;
- Impact on trunk roads;
- Road safety;
- Impact on recreational access including hills tracks;
- Impact on areas used for wild camping;
- Impact of the worker camp on local infrastructure and services;
- Lack of national strategy regarding pumped storage hydro development;
- Lack of consideration of alternative proposals or design solutions;
- Lack of jobs for the local community.

4.3 Non-Material considerations raised:

- Overprovision of renewable energy in Highland;
- The substation/grid connection should be part of the application;
- Lack of detail regarding community benefit;
- Financial risk of the proposed development;
- Corporate structure of the applicant, Earba Limited; and
- The agent, Gilkes Energy Limited, is too small, lacks the financial capability, technical expertise and project management experience to progress the proposed development.

4.4 All letters of representation received by the Council are available for inspection via the Council's eplanning portal which can be accessed through the internet www.wam.highland.gov.uk/wam. Those representations received by the Scottish Government's Energy Consents Unit can be accessed via www.energyconsents.scot It should be noted that some representations have been submitted to both The Highland Council and Energy Consents Unit.

5. CONSULTATIONS

Consultations undertaken by The Highland Council

5.1 **Laggan Community Council (Host) object** to the application. Concerns relate to: a lack of information regarding any future associated substation and connection that would be required; landscape and visual impacts including the detrimental impact to Wild Land Area 14: Rannoch – Nevis – Mamores – Alder; traffic and impacts on the trunk road network; impact of the construction workers camp on the local community; and connecting the upper Loch Leamhain to Loch Laggan appeared to be the more appropriate design solution; and a lack of detail regarding community benefits associated with the proposed development.

5.2 Whilst Laggan Community Council have contacted SSE for further information regarding future grid connection, none has been forthcoming. If the proposed development were to be approved, the associated substation would effectively be considered appropriate regardless of potential effects.

5.3 The character of what is currently a wild and relatively untouched landscape will be altered. Lochan na h-Earba will be irrevocably changed, through the two lochs being combined, and the project's dams will be visible from numerous surrounding viewpoints.

5.4 The A889 and A86 are substandard and not suitable for the significant levels of construction traffic associated with the proposed development. Requested that Transport Scotland supply a detailed traffic flow volume and impact modelling of the construction phase and commitments are made to a programme of road improvements with the applicant. Requested that Transport Scotland supply a detailed traffic flow volume and impact modelling of the construction phase and commitments are made to a programme of road improvements with the applicant to contribute to this.

5.5 The construction camp for up to 500 workers is required for up to 5 years, giving rise to noise, traffic, light and environmental damage adversely affecting residential amenity.

5.6 Details regarding community benefits lack clarity and written agreements on how affected communities will be financially compensated should be controlled by condition.

5.7 **Spean Bridge, Roy Bridge and Achancarry Community Council** do not object to the application. Concerns including the Planning Authority's approach to satisfaction of conditions at Coire Glas pumped hydro storage scheme, cumulative impacts alongside other pumped storage hydro schemes, impacts of construction traffic, impact of the construction workers camp on the local community with a lack of detail provided, landscape and visual impacts including the detrimental impact to a Wild Land Area, landscape and visual impact of tracks, impact on ecology, lack of detail regarding community benefits and request that a Community Liaison Group is established.

5.8 With regards to Coire Glas, amendments to conditions have raised concerns that the approach has lacked public scrutiny and that the local community has not been adequately informed.

5.9 They note that surrounding trunk roads the A86 and A82 are lifeline routes for the local community which have suffered from under investment. Concerned with the proposed level of traffic, road safety and mitigation measures proposed are inadequate.

5.10 Details of how the worker camp will be built, heated, lit, serviced along with sanitary/water arrangements is insufficient.

5.11 Scale of infrastructure proposed will significantly impact the sense of remoteness, sanctuary, and challenge in a Wild Land Area, particularly from elevated views. Additionally, proposed access track along Loch Earba and up to Loch Leamhain alters the character of the area entirely.

5.12 Quantification and continuity of the compensation flow out of Leamhain dam southwards within the EIAR is insufficient to assure them that the ecology of this area will not be adversely affected.

5.13 The local and community benefits will be minimal; Support for the development should only be given where it maximises net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

5.14 **Dalwhinnie Community Council** were consulted but did not respond.

5.15 **Ecology Officer** does not object to the application, subject to conditions requiring: a finalised Biodiversity Enhancement and Management Plan; Construction Environmental Management Plan; oversight from an Environmental Clerk of Works; Species Protection Plans; Biosecurity Plan; pre-construction survey; nesting bird survey; raptor survey; fencing to be marked to minimise grouse collision; collision surveys; and compensation and enhancement areas data in GIS Shapefiles. The proposed biodiversity compensation and enhancement measures are welcomed, subject to further recommendations and agreement of the finalised plans. They note all relevant licences must be obtained from NatureScot after updated surveys, prior to the commencement of works.

5.16 **Access Officer** does not object to the application, subject to a condition requiring a finalised Access Management Plan, incorporating requested amendments to the specifications of works and timings for delivery.

5.17 **Development Plans Team** do not object to the application. The proposal is in overall conformity with the approved Development Plan. The expected contribution to help achieve net zero and interim climate targets accords with NPF4 Policies 1 Tackling the climate and nature crises and 11 Energy, along with HwLDP Policy 67 Renewable Energy Developments. Notwithstanding that a pumped hydro storage scheme will use electricity from the grid to pump the water up to the higher loch, this system will help ensure energy security and resilience. Subject to consideration as to whether the proposal's avoidance and minimisation of impacts is sufficient, the proposed mitigation in terms of restoration and offsetting, with net gain in terms of soils (peat restoration), biodiversity, and tree planting, in quantitative terms accord well with NPF4 Policies 3 Biodiversity, 4 Natural places, 5 Soils, and 6 Forestry, woodland and trees. The illustrated example of community wealth building appears to align reasonably well with the intention of NPF4 Policy 25 and with the Council's voluntary Community Benefit

policy, though the exact community benefit from this proposal cannot be confirmed until its project costs and funding arrangements are finalised, anticipated in 2027. The local socio-economic benefits may be limited with only 46 full-time equivalent operational jobs anticipated; however, continued dialogue is proposed between the applicant and key stakeholders to support specific projects in the local community, which could include affordable housing. Additionally, developer contributions may be required towards transport, green infrastructure and public art.

5.18 **Environmental Health** do not object to the application, subject to conditions requiring controls on construction noise, operational noise, working hours, submission of a Construction Noise and Vibration Management Plan, Blasting Method Statement, dust mitigation scheme and updated private water supplies risk assessment.

5.19 The proposed development is set in a rural area and therefore operational noise is not expected to be audible at sensitive receptors given the separation distances from properties, land topography and the majority of plant and other noise sources being underground. Operational noise conditions are however still recommended as a precaution. Likewise, construction noise at the site itself does not raise any concern albeit new or upgraded access tracks are proposed closer to noise sensitive receptors, particularly the houses at Luiblea and Torgulbin. The worst predicted noise levels are 67dB(A) during road access works with elevated noise levels during other phases of construction. As works on the access progress away from the houses, noise will reduce, however, there will be noise from traffic for the duration of the construction period. The applicant has submitted a Draft Construction Noise and Vibration Management Plan (CNVMP) which confirms that the best practicable means will be employed to minimise the impact of construction noise and various mitigation measures proposed including the installation of noise bunds or barriers to minimise noise at Luiblea and Torgulbin (Paragraph 4.17 of the CNVMP) which shall be in place prior to the access track works commencing.

5.20 In terms of construction working hours Environmental Health recommend that activities which are audible at any noise sensitive receptor are limited between 8am to 6pm Monday to Friday and between 8am to 6pm on Saturdays (with a requirement for a reduced 45dB LAeq 1 hour between 1pm to 6pm on Saturdays as opposed to 45dB LAeq 1 hour for the rest of the time period noted). They recommend no works on Sundays that would be audible at any noise sensitive receptor. However, it is acknowledged that for a proposed development of this scale there is merit in allowing some works to be carried on outwith normal working hours if it is likely to significantly reduce the overall length of the construction period, and the impact on residents can be kept to a minimum. Working hours can therefore be controlled through the Construction Environmental Management Plan.

5.21 The Private Water Supplies Risk Assessment submitted has identified two supplies, PWS02 Luiblea Cottage and PWS03 Torgulbin, as being potentially at risk from the proposed development. The report notes that the source location for PWSO3 Torgulbin was not confirmed. Specific details confirming this supply source, mitigation/control measures to minimise contamination of supply and the finalised monitoring protocol and intervention strategy are therefore to be included within an updated Risk Assessment and controlled by condition.

5.22 **Flood Risk Management Team** do not object to the application, subject to conditions regarding further consultation on "stop generating/curtailment level" and SUDS to manage surface water run-off. They are content that there are no sensitive receptors in the vicinity of the site therefore there will not be any direct impact on flood risk to others. They note the scheme essentially operates as a closed system, with controlled upper and lower reservoirs, and so the impact on flood risk outwith the site boundary will be minimal.

5.23 **Forestry Officer** does not object to the application, subject to conditions requiring the submission of Tree Protection Plans, details of compensatory planting and future maintenance with the implementation of these overseen by a qualified Arboricultural Consultant. Within the proposed development red line boundary there are areas of existing native woodland adjacent to the access track from Moy Bridge with native pine and birch woodland around the northern portion of Lochan Na Earba, with a section of this listed in the Ancient Woodland Inventory as Ancient semi-natural origin (ASNO1860).

5.24 **Historic Environment Team – Conservation** do not object to the application. There are no listed buildings within the development area and none within the surrounding area where their setting would be affected. 7.41ha of woodland requires to be removed, plus 500 individual trees within the working corridor and 68.4ha of compensatory native woodland planting is proposed which represents significant enhancement. The Forestry Officer also noted a further 1000ha area which will be fenced to allow for native woodland regeneration.

5.25 **Historic Environment Team – Archaeology** do not object to the application. The EIAR Cultural Heritage chapter provides an appropriate level of information and assessment. However, a historic stalker path (along the Leamhain Corry headwall on the south side of Loch Leamhain) has not been covered. The path is included within the Access and Recreation EIAR Chapter and it will undergo upgrade works. Impacts to the historic path are not such that an objection to the scheme would be justified, nor would any specific mitigation. Other than the stalker path, there are no predicted impacts to recorded historic assets and no mitigation is required. The potential for further unrecorded assets within the area is considered to be low.

5.26 **Landscape Officer** does not object to the application, subject to conditions. Although the landscape impact of the proposed development on surrounding LCTs was understated in the EIAR, the applicant's assessment that significant effects would be contained to a localised area around both the lower and upper reservoirs is not disputed. The applicant's assessment of the Ben Alder, Laggan and Glen Banchor SLA is appropriate with there being no resultant long-term significant adverse effects on the Special Qualities of the SLA. Although some concerns remain that the visual impacts of the proposed development have been undervalued by the applicant, particularly during the early operational period when mitigation measures are still to become established, it is generally agreed that visual effects will not be significant at the 15 year operational period for views of the lower reservoir and associated infrastructure. It is also agreed that significant visual effects would remain for views of the upper reservoir and associated infrastructure from upland recreational routes and surrounding summits but this has been contained to a relatively localised area. Whilst concerns are raised that some of the visualisations submitted understate the visibility

of construction effects, along with the how the proposed development will appear once operational, it is generally agreed that the level of landscape and visual effects are properly assessed and are generally considered acceptable. The proposed promontories extending into Loch Earba can be improved to have a more natural appearance and this could be controlled by condition.

5.27 **Transport Planning Team** do not object to the application. No local public roads will be impacted by the proposed development as the access will be taken directly from the A86 Trunk Road onto private estate tracks serving the site.

Consultations Undertaken by the Energy Consents Unit

5.28 **British Telecom** do not object to the application. The application should not cause interference to BT's current and planned radio network.

5.29 **Historic Environment Scotland** have no objection or further comments.

5.30 **John Muir Trust** object to the application. The location is inappropriate and would have an adverse impact on a nationally important Wild Land Area. Whilst they recognise the requirement for pumped hydro storage development as part of the solution to achieving net zero targets and note the mitigation measures proposed to minimise severe negative impacts, concerns remain regarding the effectiveness of planning conditions applied as environmental safeguards and therefore cannot be certain that the scheme would not have an unacceptable impact on this well used wild place. They note that WLA 14 Rannoch - Nevis - Mamores – Alder is particularly valuable as it has retained a feeling of remoteness, whilst still being reasonably accessible, attracting many walkers, cyclists, campers and climbers. Detrimental impacts would occur on all five of the physical attributes of this WLA, which create the perceptual attributes of wildness. The high degree of perceived naturalness will be detrimentally affected through the introduction of human artefacts, increased activity, particularly during the construction phase, but also longer term through the changes in water levels and draw down scar. Additionally, the feelings of remoteness and inaccessibility will disappear with the construction of new access tracks along with other associated infrastructure.

5.31 In terms of biodiversity, detrimental impacts would occur on terrestrial habitat, woodland and peat given the loss to accommodate the proposed development, even when taking into account restoration measures and biodiversity net gain. Whilst it may be possible to regenerate these habitats in the future, they note that doing so can be difficult at high elevations with a lengthy timescale in which biodiversity will be impacted. They also reference the loss of spawning areas for Arctic charr and brown trout as a result of the flooding of the lower loch and the operational fluctuations in water level. More broadly, in the absence of a strategic approach to investment and planning for renewable energy development and energy capacity in Scotland, development in sensitive areas such as the proposed site should not be approved.

5.32 **Ministry of Defence - Defence Infrastructure Organisation** do not object to the application. The proposed development falls outwith MOD safeguarded areas and does not affect other defence interests.

5.33 **Mountaineering Scotland** do not object to the application. It is focused on the

enjoyment of hillwalking and mountaineering in a high quality environment. Whilst they recognise the significant contribution the proposed development would make to sustainability, security of electricity supply aiding grid stability they have significant concerns regarding the scale of the proposed development and associated works within a Wild Land Area. Mitigation measures proposed are of a high standard and request conditions be implemented safeguarding recreational access rights, regular reports from the Ecological Clerks of Works with the design of construction routes following best practice guidance outlined in "Constructed Tracks in the Scottish Uplands" (SNH, 2015).

5.34 **National Air Traffic Control Services** do not object to the application. The proposed development does not conflict with their safeguarding criteria.

5.35 **NatureScot** do not object to the application, subject to conditions requiring: a detailed Biodiversity Enhancement Plan, Restoration Plan and Peatland Restoration Plan; various pollution prevention measures (ECoW supervision, provision of toolbox talks, implementation of Construction Environmental Management Document, Pollution Prevention Plan, Dust Management Plan and Water Quality Monitoring Programme); and measures to prevent invasive non-native species from construction activities (Best Management Practices informed by a pre-construction survey).

5.36 Significant adverse effects on the following three qualities of WLA 14 Rannoch-Nevis-Mamores-Alder are predicted:

- WLQ1: Mountain ranges and glens of varying landscape, but all arresting, with towering, steep and rugged slopes and striking physical features.
- WLQ4: A large area which is visited by many people to experience wild land qualities in different ways, whilst maintaining a sense of remoteness, sanctuary, challenge and risk; and
- WLQ5: An extensive pattern of lochs, lochans, burns and bog that highlight the ruggedness of the landform, limit access and contribute to the sense of naturalness.

5.37 Having considered the strategic importance of this scheme in renewable energy targets, taking into account NPF4 as a whole along with the size and scale of the development, they do not object subject to the measures outlined within the comprehensive Outline Biodiversity Enhancement Plan and the Peatland Restoration Plan which will lead to significant enhancement across the wider surrounding area.

5.38 With regards to ecological designations; for the Ben Alder and Aonach Beag SAC they agree with the conclusions set out within the Shadow Habitats Regulations Assessment (HRA) that the proposed development is likely to have a significant effect on the SAC through risk of pollution, changes in flow regime and introduction of invasive non-native species via construction activities. However, the proposal will not adversely affect the integrity of the site if works are carried out strictly in accordance with the mitigation measures set out in Section 5.4 Mitigation Measures of the Shadow HRA (p30-40). The proposed development is also unlikely to have a significant effect on any qualifying interests of Ben Alder SPA either directly or indirectly, therefore, an appropriate assessment is not required.

5.39 Total avoidance of peatland for this proposal is not possible given the locational constraints associated with pump storage hydro schemes. NatureScot consider the offsetting measures detailed in the Peat Management Plan are appropriate.

5.40 Mitigation proposed for birds is considered appropriate (as outlined in Chapter 10 Ornithology and Appendix 10.1 Ornithology Confidential Annex). They welcome further bird surveys to help inform specific mitigation for Golden eagle, Black-Throated Diver and Black Grouse and would be happy to advise on the detailed Species Protection Plans (SPP).

5.41 Restoration and enhancement measures are advised to be secured by way of legal agreement, particularly for measures proposed outwith the red line boundary of the proposal.

5.42 **Royal Society for the Protection of Birds** object to the application. It does not believe the impacts of the proposed development have been properly assessed and considers that insufficient survey work has been undertaken. Priority species such as black-throated diver, golden eagle, peregrine and black grouse are present within the proposed development boundary and surrounding area. Where possible, works should avoid the bird breeding season. If the breeding season cannot be avoided, they have requested a Breeding Bird Species Protection Plan be produced detailing how species such as Divers, Black Grouse and other raptor species will be protected during construction. With regards to the construction worker camp on site, RSPB considered species protection plans taking into account the impacts of the camp should be provided with mitigation measures fully communicated to staff on site and enforced to avoid disturbance. The inclusion of an Outline Biodiversity Enhancement and Management Plan (OBEMP) is welcomed, including a minimum of 600ha of peatland restoration, reduction in deer densities, 1000ha of fenced land around the reservoir for woodland restoration is proposed and installation of a diver raft in a suitable loch. Deer fences will need to carefully marked to reduce bird strike. The 635ha of bog restoration is below NatureScot's recommended ratio for priority peatland habitat (a ratio of 1:10 is required) and that an additional 10% of restoration above the baseline assessment of the extent of priority peatland habitat should also be delivered. The OBEMP noted that 1031ha were identified within the estate as being suitable for restoration and requested the scale of restoration be increased to reflect this ratio.

5.43 **Scottish Environment Protection Agency** do not object to the application, subject to conditions requiring: a finalised Peat Management Plan; detailed design of watercourse crossings; use and restoration of borrow pits; use of excavated materials at the site; and risk assessment for the ground abstraction located within 250m from proposed excavations. A Controlled Activities Regulation (CAR) application has been submitted for the hydropower element of the proposed development and welcome the twin-tracking approach alongside this application. Fisheries, third party water users, protected species and habitats within the bed and banks of the water features and inundation area are all fully assessed as part of the CAR determination process with that application pending consideration.

5.44 Watercourse crossings (WX02, WX06, WX07, WX09, WX11 and WX14) are all to be single span bridges designed to accommodate a 1 in 200 year flood event, including an allowance for climate change. All other crossing shall be designed as outlined in in

EIAR Volume 4 Appendix 12.3 Schedule of Watercourse Crossings. A groundwater abstraction (PWS02) is within 250m of proposed excavations which include a borrow pit with works deeper than 1m which will require a detailed risk assessment.

5.45 It is estimated that approximately 4.5 million tonnes of spoil will be generated and that all the material can be used in site reinstatement to create promontory areas in the centre of the Earba reservoir. Full details regarding the volume and manner of material handling, use and storage will be required. Three borrow pits are proposed, one to provide material to build into the site, one to provide sands and gravels at the Lower Earba Dam and one to provide additional material to build the Shios Dam. The latter two borrow pits will be within inundation areas and are to be excavated and restored as outlined in the Mass Balance Strategy and Borrow Pit Plan (EIAR Volume 4 Appendix 2.4).

5.46 Whilst 250,000m^3 of peat will be disturbed by the proposed development, the amendments made following early engagement from the developer are welcomed, particularly the location of the Shuas Dam, to try and minimise peat disruption with other elements of the development generally avoiding the deepest peat. The Peat Management Plan (Volume 4 Appendix 12.2) indicates that all the disturbed carbon rich soil can be used in site reinstatement.

5.47 **Scottish Forestry** do not object to the application, subject to a condition regarding felling, restocking and compensatory planting proposals. It welcomes the applicant's commitment within the EIAR to ensure that any proposed changes to woodland address the requirements of Scottish Government's Policy on Control of Woodland Removal (CoWRP). Where woodland of high sensitivity is affected, as is the case here, the area of Compensatory Planting (CP) must always exceed the area of woodland being removed to compensate for the loss of environmental value. Whilst 68ha of on-site compensatory planting is welcomed, following the 7.41ha loss of woodland, the compensatory planting plan must demonstrate and commit to the specific area, within any wider planting scheme or habitat improvement that the compensatory planting for this development is located. Any compensatory planting (by regeneration or planting) required as a result of the proposed development may also need to be considered under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 separate to the planning process. Any additional felling which is not part of the planning application will require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act).

5.48 **Scottish Water** do not object to the application. A review of their records indicates that there are no drinking water catchments or water abstraction sources which are designated as a Drinking Water Protected Area (DWPA). Scottish Water will not accept any surface water connections into their combined sewer system.

5.49 **Transport Scotland** do not object to the application, subject to conditions to: secure the proposed access details form the trunk road; route for any abnormal loads on the trunk road network; accommodation measures for abnormal loads including the removal of street furniture; junction widening and traffic management and any additional signing or temporary traffic control measures. Transport Scotland welcome the Construction Traffic Management Plan (CTMP) and an Abnormal Load Transport Management Plan which will be prepared and implemented during the construction

phase.

5.50 **Perth and Kinross Council** has no objection or further comment as a neighbouring local authority.

5.51 **Cairngorms National Park Authority** has no objection. CNPA base its recommendation on the advice received from NatureScot. In this instance it has been concluded that the proposed development will not introduce any adverse effects on the Special Landscape Qualities and landscape character of the National Park.

6. DEVELOPMENT PLAN POLICY/OTHER POLICY CONSIDERATIONS

6.1 Appendix 2 of this report provides details of the documents which comprise the adopted Development Plan, including details of pertinent planning policies as well as adopted supplementary guidance, and other material considerations which are relevant to the assessment of the application.

7. PLANNING APPRAISAL

7.1 Should Ministers approve the development, it will receive deemed planning permission under Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended). Although not a planning application, the Council processes Section 36 applications in a similar manner given that planning permission may be deemed to be granted.

7.2 Schedule 9 of The Electricity Act 1989 contains considerations in relation to the impact of proposals on amenity and fisheries. These considerations mean the developer is required to:

- have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings, and objects of architectural, historic or archaeological interest; and

- reasonably mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

7.3 It should be noted that for applications under the Electricity Act 1989 that the Development Plan is just one of a number of considerations, and therefore Section 25 of the Town and Country Planning (Scotland) Act 1997 which requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise, is not engaged. That said, the application is still required to be assessed against all policies of the Development Plan relevant to the application, all national and local policy guidance, and all other material considerations relevant to the application.

Planning Considerations

7.4 The key considerations in this case are:

a) Compliance with the Development Plan / Other Planning Policy
b) Energy and Economic Benefits

c) Design, Landscape and Visual Impacts (including on Wild Land Areas)
d) Construction
e) Noise and Vibration
f) Roads, Transport and Access
g) Water, Flood Risk, Drainage and Peat
h) Natural Heritage (including ornithology)
i) Forestry
j) Built and Cultural Heritage
k) Other Material Considerations

Development Plan / Other Planning Policy

7.5 The Development Plan comprises National Planning Framework 4 (NPF4), the adopted Highland-wide Local Development Plan (HwLDP), the adopted West Highland and Islands Local Development Plan (WestPlan), and all statutorily adopted supplementary guidance, including Developer Contributions Supplementary Guidance. Appendix 3 of this report provides an assessment of compliance with the Development Plan / Other Planning Policy.

7.6 NPF4 outlines that Scotland is facing unprecedented challenges and that we need to reduce greenhouse gas emissions and embrace and deliver radical change so we can tackle and adapt to climate change, restore biodiversity loss, improve health and wellbeing and build a wellbeing economy while striving to create great places. Therefore, NPF4 sets out that choices need to be made about how we can make sustainable use of our natural assets in a way that benefits communities.

7.7 NPF4 outlines 18 national developments that support the plan's spatial strategy. National developments will be a focus for delivery, as well as exemplars of the Place Principle, placemaking and a Community Wealth Building (CWB) approach to economic development. Six of the national developments support the delivery of sustainable places. Among these is national development number 2 – Pumped Hydro Storage and 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

7.8 In summary, the principle of pumped hydro storage development is well established in national policy, with the proposed development being of national importance for the delivery of the national Spatial Strategy. NPF4 considers that pumped hydro storage development will play a significant role in balancing and optimising electricity generation and maintaining the operability of the electricity system as part of the transition to net zero. It is further necessitated with the move towards a decarbonised system with much more renewable generation, the output from which is defined by weather conditions. This is also reflected within other material policy considerations, with Government policy giving significant weight to the importance of achieving net zero through the deployment of renewable energy development at pace. Government legislation and policy maintains the commitment to attaining net zero by 2045. When determining renewable energy proposals, the ability to meet these targets therefore demands substantial weight when undertaking the planning balance exercise.

7.9 Alongside these ambitions, the strategy for Highland aims to protect environmental

assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4. At the regional level, HwLDP also offers support for renewable development proposals where they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments. A more detailed analysis of relevant policy and guidance is provided in Appendix 3.

Energy and Economic Benefit

7.10 The Council continues to respond positively to the Scottish Government's renewable energy agenda. Whilst there has been a focus on onshore wind energy in Highland for the last generation, large scale pumped hydro storage schemes are becoming a viable complementary renewable energy source alongside on and offshore wind energy. The Highland region offers significant opportunities for pumped hydro storage development given the requirement for an upper and lower reservoir to successfully generate electricity. Onshore wind energy developments in Highland accounts for around 30% of the national installed onshore wind energy capacity and the opportunities for pumped hydro storage development can further diversify and help balance demands on the transmission network.

7.11 Notwithstanding any impacts that this proposal may have upon the landscape resource, amenity and heritage of the area, the development could be seen to be compatible with Scottish Government policy and guidance, making a substantial contribution to meeting the Government, UK and European energy targets, with the development having the potential to generate up to 1800MW. The annual power generation from the proposed development when operational is 4,500GWh.

7.12 EIAR Volume 4 Appendix 12.6 Carbon Balance Calculation includes an assessment which assumes that to facilitate the proposed annual power generation, surplus energy generated from renewable and low carbon sources is used to pump water from Loch Earba to Loch Leamhain and to "prime" the Pumped Storage Hydro (PSH) scheme. The large amount of energy stored by the proposed development means that it will both store significant amounts of surplus wind energy, which would otherwise be lost and displace conventional gas generation reducing emissions. The proposed development therefore has the potential to rapidly supply clean electricity to the national grid powering over 1,400,000 UK households and saving over 2 million tonnes of CO2 annually.

7.13 Pumped hydro storage development provides an important mechanism for the reduction of carbon dioxide (CO2), and other greenhouse gas (GHG) emissions into the atmosphere by reducing the consumption of fossil fuel generated mains electricity. However, during their manufacture, construction and decommissioning, renewable developments can result in the emissions of Green House Gas (GHG), particularly where natural carbon stores, such as peat, are present and potentially impacted by the development, often termed "carbon balance". The EIAR assesses the GHG emissions and uses carbon dioxide equivalent (tCO2e) where equivalence means having the same warming effect as CO2 over 100 years.

7.14 The calculated GHG losses associated with the proposed development are of the order of 1,743,381 tCO2e. The volume of materials (rock, sand and gravel) generated

during the construction phase have been estimated at 11.5 million(M) m^3. To calculate the GHG losses associated with the extraction of this material, which is not included within the Carbon Calculator Tool, the GHG emissions for aggregate material use have been used. The calculated GHG losses associated with the use of 11.5Mm^3 of materials within the proposed development approximately 240,638 tCO2e. When factoring in both the extraction and use of the excavated materials the total GHG loss will be 1,984,018 tCO2e. The net emission of GHG (tCO2e) which would be saved by utilising the PSH for power generation instead of the UK Grid mix is approximately 1,944,000 tCO2 per year. Therefore, given the significant scale and generation capacity of the proposed development, the carbon payback time is calculated as slightly over 1 operational year, with the scheme proposed to be operated in perpetuity.

7.15 The proposed development anticipates a construction period of approximately 7 years and with proper maintenance remain operational indefinitely. There are likely to be adverse effects caused by construction traffic and disruption, particularly during the construction phase when abnormal loads are being delivered to site. Such projects can offer investment and opportunities to the local, Highland, and Scottish economy, including businesses ranging across the construction, haulage, electrical and service sectors.

7.16 EIAR Volume 1 Chapter 19 Socio-economics and Tourism provides an assessment of these matters compiled by MKA Economics who specialise in appraising the economic viability, socio-economic value and advising on the delivery of economic development projects.

7.17 The capital cost (Capex) of the project is reported to be £1.8 billion (refer to Section 4.27 Supporting Planning and Energy Policy Statement).

7.18 During construction, the applicant's evaluation of the socio-economic impact and operation was assessed as having beneficial effects for the regional Highland economy. It will create new temporary jobs through the construction programme and a high proportion of the economic and employment impacts would come from the tunnelling works and the powerhouse and lower control works, which require extensive excavation and support work.

7.19 During construction an average of around 500 people are anticipated to be onsite. A total of 2,041 construction related years of employment are predicted with a GVA effect of £134 million at the Scottish level. It is estimated that there will be approximately 3,023 person years employment (PYE) over the five year core construction period. Of which, 737 PYEs are expected to benefit the regional (Highland) economy, with 1,512 PYEs at the Scottish level (including Highlands).

7.20 Once fully operational, the proposed development will create 46 new full time jobs, injecting £2 million per annum into the local economy. These figures include multiplier effects.

7.21 Additionally, the applicant considers the construction and operational effects will bring significant GVA impacts, as well as wider additional impacts, including perception benefits, salary benefits, exchequer benefits, local supply chain opportunities and positive pre-development impacts.

7.22 It is considered that surveys of the public and business attitudes to green energy developments provide no clear evidence that the presence of an investment in an area has a negative impact on local tourism. Tourists using local routes and tourist attractions may have a particular sensitivity to visual effects, however, access to tourist facilities will be largely unaffected by this proposal. The applicant suggests that the tourism sector would likely benefit from expenditure by workers during the construction and development phases, and to a lesser extent during the operation and maintenance phases given the relative lack of visits required once the site is functioning.

7.23 Highland is experiencing significant construction activity of renewable energy development and the associated electricity transmission infrastructure. The approval of the proposed development would have a positive economic impact, particularly during the construction period, although this would thereafter curtail at operational stage. Representations have raised the economic impact that renewable related energy development may have on tourism more generally. These adverse impacts are most likely to be most acute during construction which is temporary in nature and can be managed through environmental mitigation measures as specified elsewhere in this report and can be secured by condition. Additionally, some representations note that jobs required at the operational stage will decrease significantly. Whilst this is correct, 46 permanent full time jobs is a considerable number given the relatively rural nature of this part of the Highlands.

7.24 Scenery and the natural environment within Highland are important factors for many visitors when choosing the area as a holiday destination. A number of representations considered the proposed development would have a detrimental impact on visitors to the area. Any detrimental impact of the proposed development on tourism, whether visually, environmentally or economically, should be identified and considered in full. Whilst development associated with renewable energy development more generally may not stop people from visiting the area for the first time to take part in walking, mountaineering or other recreational activities and tourist attractions, it has the potential to discourage repeat visits.

7.25 Whilst this is noted, there may also be indirect effects that are not considered by the analysis provided. For example, there are tourist accommodation businesses at Kinloch Laggan and the wider surrounding area that could experience adverse impacts through loss of its traditional customers on account of construction impacts. However, there is the potential for such businesses to adapt to assist with the expected influx of workers associated with the proposed development and wider project, even with the contained on-site workers accommodation taken into account. The positive economic impact of other renewable energy projects in the wider area is well known by many local businesses (B and B's, hotels, property lettings, shops) who have benefited from major construction works.

7.26 NPF4 Policy 11 c) offers support to schemes where community socio-economic benefits are maximised, with NPF4 Policy 25 enabling support to be given to schemes which contribute towards a local or regional wealth building strategy or have an element of community ownership. With no community ownership being proposed, the proposal cannot be given any additional support under NPF4 Policy 25. A condition could however be imposed to require a Local Employment Scheme for the construction of the development which refers to the provisions set out within the socio-economic

assessment contained within the EIAR. The recommendation before Members is to include such a condition to maximise the socio-economic benefits of the proposed development.

Community Benefit

7.27 NPF4 Policy 11, in particular paragraph c), notes that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. Additionally, NPF4 Policy 25 provides support for development that is consistent with local economic priorities and where they contribute to local and/or regional community wealth building strategies.

7.28 Since the application has been submitted the Council has published the Social Value Charter for Renewables Investment in June 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. The nine point plan articulates the expectations of the Highland area for any renewables and green energy developments in the region.

7.29 The applicant has provided a Community Benefit Fund brochure in which they outlined their intentions with regards to the likely scale of community benefits proposed. Owing to the nature of this document relating to community benefit, which is voluntary in nature, it is not deemed a material planning consideration and is sperate to the planning process. Nevertheless, the Planning Officer has directed the applicant to the Council's Community Support and Engagement Officer and the Council's Economy and Regeneration Team who liaise directly with applicants on this matter.

7.30 Whilst not material, the details have already been in the public domain for some time following presentations from the applicant to Spean Bridge Roy Bridge and Achnacharry Community Council, Dalwhinnie Community Council, Laggan Community Council and Newtonmore Community Council outlining the proposed community benefit package. Also, the details are available through the proposed development website.

Design, Landscape and Visual Impacts (including on Wild Land Areas)

7.31 The applicant has presented a number of submissions to illustrate the design, landscape and visual impact of the development both singularly and cumulatively with existing hydro developments. In this regard the applicant has tabled design iterations following: input from pre-planning considerations; maps highlighting the Zone of Theoretical Visibility (ZTVs); 11 visualisation locations across a study area of 10km; representative wirelines; and assessment against Landscape Character Types, Special Landscape Area Citations, Descriptions of Areas of Wild Land, Cairngorms National Park. EIAR Volume 1 Chapter 7 Landscape and Visual is supplemented by EIAR Volume 4:

- Appendix 7.1 – Technical Methodologies for Visual Representation
- Appendix 7.2 Visual Assessment Tables;
- Appendix 7.3 Assessment of Landscape Character Types

- Appendix 7.4 Assessment of Cairngorms National Park;
- Appendix 7.5 Assessment of Wild Land Area 14: Rannoch – Nevis - Mamores – Alder; and
- Appendix 7.5.1 WLA Locational Assessment Analysis and Assessment of Special Landscape Area.

7.32 Given the rural location there is minimal visual impact, if any, on residents, settlements and road users, with the principal receptors for this development being recreational users of the outdoors. The 11 visualisation locations, all within 10km from the development, are representative of a range of effects for recreational users of the outdoors with photomontages and wirelines contained within the EIAR Volume 3a and 3b to Highland Council and NatureScot's standards.

7.33 The expected bare earth visibility of the development can be appreciated from the EIAR Volume 2 Figure 7.1a Study Area with ZTVs for Dams and Powerhouse and Figure 7.1b Study Area with ZTVs for Dams gives an overview of the visibility within the changing landform. EIAR Volume 2 7.6 Potential Visual Receptors and Figure 7.7 Visual Receptors Included in the Assessment shows key routes and their users within the 10km study area.

Siting, Design Materials and Layout Evolution

7.34 EIAR Volume 1 Chapter 3 Consideration of Alternatives and Design Evolution Iterations describes the scheme's site selection, as well as the evolution through several design and layout iterations. Consideration was given to alternative reservoir connections such as:

- Loch Earba to Loch Laggan;
- Loch a Bhealaich Leamhain to Loch Earba;
- Creag Pitridh Coire a Mhaigh to Lochan Na h-Earba;
- Geal Charn – Lochan Na H Earba;
- Loch Coire Chuir to Lochan Na H Earba; and
- Loch a Bhealaich Leamhain to Loch Laggan.

These were discounted as the proposed development has significantly greater potential energy storage than the other options.

7.35 The design of the proposed development has also followed a constraints based approach in order that mitigation on environmental effects is embedded within the design, with key constraints including landscape character and visual amenity; ground conditions, topography and peat; trees; watercourses, private water supplies and related infrastructure; protected species and ornithology.

7.36 There have been various refinements since the pre-application and EIA Scoping which include the increased power capacity from 900MW to 1,800MW which requires: a larger powerhouse; increased energy storage from 33GWh to 40GWh by increasing the dam heights and reservoir volumes; relocation of the main access, site compounds and access tracks following ecology surveys which minimise the impact on sensitive

peatland and bird habitats; development of a significant biodiversity enhancement and management programme to ensure biodiversity net gain.

7.37 Leamhain Dam and upper reservoir will be constructed with rockfill marginally below the outflow of Loch Leamhain capable of storing approximately 55Mm^3. The level of the loch will be raised from its existing level of 636m AOD to a maximum level of 710m AOD. The drawdown range is extensive at 70m, with the operating range 640m AOD at its lowest and 710m AOD at its highest. The upstream face would have an impermeable membrane finish of either concrete or asphalt with the downstream face rockfill. The applicant notes that concrete is the preferred material (as shown on visualisations) however this is dependent on the contractor's working method with scope to choose with both providing a watertight barrier. This upper dam will be substantial with a 1:5 gradient and height between 85m, at its tallest point above the outlet, reducing to 80m either side of this, with a length of 1250m, constructed from materials quarried from the borrow pits within the reservoir drawdown footprint.

7.38 During the construction phase, Loch Leamhain would be partially drained to a level of 612m AOD for a temporary period allow for working areas and some borrow pits to remain below the final low water level within the reservoir. Along with the benefits for silt and drainage management during construction, this approach minimises environmental impacts and habitat loss. An access track will be formed across the dam crest and along the eastern outer boundary leading to the valve house. A spillway will be installed along the north eastern frontage of the Leamhain Dam leading to the dam bottom outlet control structure which will deliver residual flows and freshets (sudden increase in flow caused by heavy rains or melting snow) to maintain the existing flow profile of the burn downstream from Loch Leamhain. The upper control works are located on the north western shoreline opposite the dam with the intake and housing the 3 headrace tunnels measuring up to 10m in diameter which connect the upper and lower reservoir. Screens and isolation gates are set further back.

7.39 The Shuas Dam, Shios Dams and lower reservoir will be constructed with two earthfill or rockfill embankment dams at each either end of Loch Earb (Shios Dam on the north eastern shoreline and Shuas Dam on the south western shoreline) to create a reservoir capable of storing approximately 65Mm^3 of water. It is already a reservoir for the existing 1MW Ardverikie hydro scheme. The level of the loch will be raised from its existing level of 353m AOD to a maximum level of 376m AOD. The drawdown range is far less extensive at 26m, with the operating range 355m AOD at its lowest and 376m AOD at its highest.

7.40 The Shios Dam will have a 1:3 gradient, a maximum height of 31m, with a length of 430m, with either concrete or asphalt finish. An access track will be formed across the dam crest. The downstream face of the dam would require a section of concrete spillway and semi-buried valve structure but would otherwise be topsoiled and vegetated to blend in with the surrounding areas. Water to both the existing Ardverikie hydro scheme and compensation flow is provided through the central bottom outlet.

7.41 The Shuas Dam will also have a 1:3 gradient, measure approximately 27m in height, with a length of 730m, with either a concrete or asphalt finish. An access track will be formed across the dam crest. The downstream face will also be topsoiled and vegetated to blend in with the surrounding areas. NatureScot raised concerns with the applicant's proposal to use peat in the landscaping of the downstream faces of the

Shuas and Shios dams. These faces will be at a relatively low angle for dams (1:3) and no steeper than some of the locations from which the relocated peat will be taken. They confirm they are not attempting to establish peat bogs on the dam faces, rather use the peat, and the vegetated turves from its surface layer, to create a vegetated engineered peaty soil landscaping material capped with vegetated peat turves that will blend in with the heathland either side of the dam. Whilst the applicant notes that this type of finish has been carried out on many dams in the UK, NatureScot have raised concerns regarding the effectiveness, therefore, further discussion will be required with the finalised agreed approach, to be controlled by condition.

7.42 An underground waterway system, including up to three headrace tunnels, will connect the reservoirs as shown in (EIAR Volume 2 Figure 2.2 - Scheme Arrangement). Up to three intake/outfall structures located side by side at the north western shoreline of Loch Leamhain will be constructed to carry water between the upper and lower reservoirs through the powerhouse. The intakes will be constructed from reinforced concrete below the reservoir operational low water level. Flows will be reversible, dependant on whether the scheme is pumping or generating. The headrace will be approximately 10m in internal diameter and lined with steel or concrete. The tunnels will split so that one tunnel continues to the powerhouse shafts. Surge shafts will connect each tunnel to the surface to provide relief for pressure within the tunnels during operation. Each surge shaft will have a maximum diameter of 15m at the surface, located on the flank of Creag Pitridh. At the surface, there will be a concrete wall approximately 2.5m high to ensure safety. Tailrace tunnels measuring approximately 100m will be constructed to connect each pump turbine with the lower controls in Loch Earba. The lower control works will accommodate flows into and from the powerhouse consisting of six concrete inlet and outlet structures at the end of the tailrace tunnels fitted with hydraulic gates to isolate the reservoir during maintenance. The gates will be connected to the ground surface by shafts, each with a hoist chamber at the top to house the operating mechanisms for the gates. The tailrace tunnels will have screens for the exclusion of fish and debris and a hardstanding will be provided to allow access to the screens and to allow for maintenance of the lower control works.

7.43 The powerhouse will be set back from the eastern shore of Loch Earba and will comprise up to six shafts, each of nominal 300MW generating capacity, approximately 70m deep sunk from the floor level of 377m AOD in a benched cutting within rock excavated approximately 25m below the sloping hillside. Each shaft will contain a reversible pump turbine and motor generator with associated equipment. The shafts would sit beneath a surface building which would contain an overhead crane and other facilities including offices, storage, transformers and other equipment. The powerhouse building will have a “green” roof, the roof line will sit below the general profile of the surrounding ground level to provide screening and embed the structure into the landform. The height of the powerhouse would be 18m with “benched cutting” at the side elevations at 377m AOD which would be tiered with planted trees and other vegetation. An indoor electrical switchyard will be constructed with a footprint of approximately 150m by 70m to the northern end of the powerhouse. An access tunnel entrance is located to the rear of the powerhouse building.

7.44 Aqueducts will be constructed to pick up flows from Allt Coire Pitridh and Allt Coire a’ Chlachair watercourses to divert them around the Shuas Dam into the Earba

Reservoir. Additionally, the Shuas Aqueduct, a buried pipeline, would divert water from the downstream side of the Shuas Dam into the small reservoir to the west of this area, Loch Meall Ardruighe which in turn drains to the Abhainn Ghuilbinn.

Landscape and Visual Impact

7.45 A Landscape and Visual Impact Assessment (LVIA) forms part of the EIAR and provides:

- a landscape assessment of potential effects of the development on landscape character, designated and protected landscapes; and
- a visual assessment of potential effects of the development on visual amenity of those present within the landscape, including established views from residential areas and routes.

7.46 The LVIA also gives consideration to cumulative effects occurring as a result of the addition of the proposed development alongside other proposed hydro, renewable energy and electrical infrastructure development within the study area.

7.47 Potential effects have been considered during the construction phase of the proposed development and during operation, in year 1 and year 15, to illustrate the change associated with proposed mitigation, landscaping, planting and regeneration measures. To aid assessment of this early operational phase, select visualisations have also been provided for year 5 of operation of the development.

7.48 The methodology for the LVIA is sufficiently clear, being generally in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). The methodology outlining how the applicant has come to their findings is included (EIAR Volume 1 Chapter 7 Landscape and Visual). This methodology has been used to appraise the assessment provided and to come to a view on what combination of effects on the sensitivity of receptor and magnitude of change are leading to a significant effect.

7.49 In the assessment of each viewpoint, the applicant has come to a judgement as to whether the effect is significant or not. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings.

7.50 The sensitivity of receptors is influenced by the value of the view and susceptibility to change leading to a sensitivity rating. Familiarity with the site and the extent, nature, and expectation of existing views by visual receptors is a key factor in establishing the visual sensitivity in terms of the development proposed.

7.51 The applicant has assessed the sensitivity of receptors between Medium-High and High given that recreational users of the outdoors attention and interest is on their surroundings. The applicant's Medium-High rating is contested for all receptor locations which are appraised as being High. This is due to the study area being well used for various recreational activities, predominantly for walking and cycling, but also mountaineering, rock climbing, cycling, running, swimming, canoeing, fishing, horse riding, camping, and caving. The relative remoteness of the locality heights the sense

of challenge and reward for outdoor enthusiasts and therefore, the sensitivity of each assessed recreational viewpoint is elevated. A large appeal of those taking part in these recreational pursuits in this part of Highland is to experience the surrounding landscape and views, with receptors in this area being people on walking routes connecting to Munro summits within either WLA 14 and/or an SLA which increases their sensitivity.

7.52 The magnitude of change on views is an expression of the change that would result from the proposed development influenced by the size or scale of change, geographical extent, leading to a magnitude of change rating. From a number of viewpoints, the applicant has understated the effects on receptors given the significant change brought about by proposed development within the landscape.

7.53 The guidelines require evaluation of magnitude of change to views experienced by sensitive receptors, comprising individuals living, working, travelling and carrying out other activities within the landscape, and the subsequent evaluation of the significance of effects. The potential to mitigate adverse effects has also been considered for both landscape and visual assessment.

7.54 In the assessment of each receptor and representative viewpoint the applicant has come to a judgement as to whether the effect is Significant or not. This is undertaken on a viewpoint by viewpoint and case by case basis. In assessing visual impacts in particular, it is important to consider that the viewpoint is representative of particular receptors i.e. people who would be at that point and experiencing that view of the landscape not just in that single view but in taking in their entire surroundings. A key consideration in the effects on receptors of pumped hydro storage development is the sequential effect when travelling through an area on the network of recreational routes. Those travelling along scenic, recreational routes, whether designated as such or not, have a higher sensitivity to views.

7.55 The applicant has assessed a variety of landscape and visual receptors within the study area, including building based receptors and route based receptors. The effects on visual amenity relate to changes to available views rather than perceived changes to whole areas of a distinctive landscape character. 11 visualisation locations (VL) were selected in order to assess landscape and visual impact. The viewpoints have been assessed at the construction phase, year 1 and year 15 of operation. This is considered appropriate as it will take some time for the proposed landscaping, tree planting and other mitigation measures to become established along with weathering of the dam side-slopes.

7.56 Whilst it must be recognised that the submitted visualisations do not provide the entire wider context when not viewed on site, they do demonstrate the predicted effects well and are a useful aid in conceptualising the development and predicting its associated impacts.

7.57 The associated Zone of Theoretical Visibility (ZTV) drawings (Figures 7.1a-b) also provide the predicted extent of bare earth visibility of the proposal. These indicate that visibility of the Leamhain Dam would be mostly experienced in the south eastern portion of the study area, generally from elevated summits, ridgelines and slopes to the south across Càrn Dearg and An Lairig along with River Pattack valley and Loch Ericht to the east. There will also be some lower level visibility around Loch Pattack. There

would be limited visibility from elevated summits to the north-west including the summits of Creag Meagaidh and Beinn a' Chaorainn.

7.58 The Shios Dam and Shuas Dam, along with the powerhouse to a lesser extent, would be visible from the surrounding slopes and summits within the immediate context of the proposed development within the Loch Earba valley. This would extend into areas through the valley floor and slopes to the south west and north east. The Shuas Dam and powerhouse tend to be a focus across areas to the south west with the Shios Dam a focus across areas to the north east. There is also limited visibility across higher slopes and summits to the north of Loch Laggan and around Glen Shirra. However, woodland and forest cover around Strath Mashie, Loch Laggan and in close proximity to Shios Dam would minimise most views with the exception of more distant, elevated areas to the north of Loch Laggan.

7.59 Access tracks between Moy and Bealach Leamhain (see Figures 7.2a-b) shows visibility of vehicles using the track seen over a relatively wide area to the north, west, along with higher ground to the north east and summits to the south west. From lower ground levels the surface of the track would not be visible and with reinstatement of vegetation on cuttings and embankments the tracks would be less noticeable longer term.

Visualisations

7.60 Following a review of the LVIA, sufficient information has been provided to enable an assessment. Whilst some concerns were raised regarding faintness of images, coloration of images, haze, cloud cover etc. within the visualisations provided (assessed further for each visualisation location below), overall, the photomontages are considered to have been produced to an appropriate standard.

7.61 Highland Council's Landscape Officer also noted that visualisations provided show the proposed water level at its mid-point. Visualisations for wind energy proposals would be expected to show the worst case scenario with regards to landscape and visual impacts, therefore, they questioned why visualisations showing the maximum drawdown zone were not provided. The developer has referenced the reasoning for the mid-point visualisations (EIAR Volume 1 Chapter 7 Landscape and Visual paragraph 7.3.13 – 7.3.16) as this water level is considered to be the most likely scenario for receptors viewing the proposed development given the fluctuating levels of the reservoirs. As this is not worst case, the LVIA considers the landscape and visual effect of the full potential drawdown at each reservoir shown by the maximum and minimum loch levels presented in accompanying wireline visualisations (EIAR Volume 2 Figures 7.5.6a-7.5.6i Representative Wirelines).

7.62 The applicant noted that visualisations are intended to provide an illustrative resource to help people understand how the proposed development would appear within the landscape. They consider that showing reservoirs fully drawn down or fully filled would not necessarily provide the most likely scenario given such a situation would only happen if a maximum generation or pumping episode had just occurred. The developer considers the worst case scenario for wind turbines is not comparable given the changing visual nature of pumped storage hydro schemes over time and dependent on operational requirements. Neither loch will be completely drawn down with the minimum level in both lochs retaining a substantial volume of water. Loch Leamhain

has a current minimum water level of 635m AOD and Loch Earba has a current minimum water level of 350m AOD with the minimum level in both lochs proposed to be at least 5m above the current water levels.

7.63 Additionally, given the nature of pumped hydro storage, if one loch is full the other is empty so receptors would see an extreme version of either loch in this setting. Showing both lochs half full provides an accurate version of an applicable scenario, with the visual effects of the loch as well as its associated side drawdown zones being shown.

7.64 A number of representations raised concerns regarding the drawdown scar and fluctuating water levels noting that they considered there was a lack of supporting information outlining how quickly water levels would increase or decrease in both the upper and lower lochs. These details are covered in the LVIA (Consideration of Drawdown Fluctuations within the LVIA between paragraphs 7.3.13 - 7.3.16). Based upon an installed generating capacity of up to 1,800MW it would take approximately 22 hours of continuous electricity production at maximum output to move the maximum volume of water from the upper to lower reservoir. This would fill the lower reservoir but would not fully draw down the upper reservoir if starting from full. Conversely, it would take approximately 30 hours of pumping to move this volume of water from the lower to upper reservoir, which would lead to maximum drawdown appearance in the lower reservoir.

7.65 The fluctuations in water level would be subject to the demands of the electricity market and may vary considerably day to day, therefore, there would be no predictable pattern of generation and pumping or predicable levels of drawdown on any given day. However, in reality, the potential for people to experience either of the reservoirs to be fully drawn down or fully filled at any given time would be rare because this would usually occur only if a maximum generation or pumping episode had just occurred. Whilst the LVIA gives consideration to the landscape and visual effect of the full potential drawdown, judgements have been made based on a varying situation and how the development would be viewed for the majority of the time.

7.66 Additionally, some concerns were raised by the Planning Case Officer and Landscape Officer regarding faintness of images, coloration of images, haze, and cloud cover within the visualisations provided. Additionally, whilst the inner face of the dam is to be either concrete or asphalt finish (concrete has been depicted in the visualisations) a number of visualisations show this matching closely to the tone and colours of existing vegetation. Whilst these are noted in the appraisal of visualisations provided in Appendix 4 – Viewpoint Assessment Appraisal – Visual Impact, the applicant has responded on these particular points, reiterating that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance, which is agreed. Whilst photomontages provide a useful aid in showing the appearance of the proposed development, they are just one tool used by the Planning Authority in the assessment of landscape and visual impact.

Landscape Impact

7.67 The landscape assessment has considered the potential effects of the proposed development to Landscape Character Types (LCTs), Cairngorms National Park, Ben Alder, Laggan and Glen Banchor Special Landscape Area (SLA), and Wild Land Area

(WLA) 14: Rannoch – Nevis – Mamores – Alder.

7.68 There are several aspects to consider in determining whether this development represents an acceptable degree of impact on landscape character, including:

- impacts on the Landscape Character Type (LCT) as a whole and on neighbouring LCTs; and
- direct impacts on landscape designations and impacts on surrounding landscape designations.

7.69 The LVIA forming Chapter 7 of the EIAR gives an overview of the impacts and effects of the proposed development on landscape designations within the study area. EIAR Volume 4, Appendix 7.3 gives a more detailed assessment of Landscape Character Types.

7.70 The proposed site boundary falls across 5 different Landscape Character Types (LCT) - LCT 85: Isolated Mountain Plateau, LCT 86: Smooth Rounded Hills - Badenoch and Strathspey, LCT 87: Small Craggy Knolls and Hills, LCT 89: Broad Loch and Glen and marginally extends into LCT 235: Broad Forested Strath.

7.71 A further 6 LCTs were scoped out of the assessment given the limited extent of theoretical visibility and/or predominance of woodland which limits the potential for significant effects. These are LCT 124: Summits and Plateaux – Cairngorms, LCT 221: Rolling Uplands – Inverness, LCT 231: Upland Glen – Inverness, LCT 235: Broad Forested Strath, LCT 373: Upper Upland Glens with Lochs and LCT 376: Summits and Plateaux – Tayside. This approach is agreed.

7.72 The upper works of the proposed development are located within LCT 85: Isolated Mountain Plateau. The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 85: Isolated Mountain Plateau as:

- Plateaux of distinctive massive, smooth topped mountains with angular shoulders and square appearance.
- Individual mountains with overall curved profile, separated by glens and moorland.
- Frequent rugged features such as rock outcrops, pyramidal peaks, ridges, corries and scree slopes.
- Rugged and seemingly natural landscape with evidence of natural processes.
- Extensive areas of montane habitat, with heather moorland, rough grassland and willow scrub on lower slopes and occasional patches of highland birchwoods.
- Low-intensity land use, mainly deer grazing.
- Man-made structures limited to one cottage, a 19th Century Ordnance Surveyors encampment at the summit of Ben Alder, the remains of shielings, and several rough tracks and paths.
- Strong sense of wild character due to openness and exposure, ruggedness and naturalness, and lack of structures.

7.73 This LCT forms part of Ben Alder, Laggan and Glen Banchor SLA with the portion to the north of Loch Laggan within WLA 19: Braeroy - Glenshirra - Creag Meagaidh and the portion to the south of Loch Laggan within WLA 14: Rannoch – Nevis – Mamores – Alder. It is noted for its sense of remoteness and rugged upland character and is popular for outdoor recreation including hill walking and climbing.

7.74 During construction there will be various elements of activity within this LCT around Loch Leamhain for the construction of the Leamhain Dam, upper intake, construction and use of associated tracks, compound areas and borrow pits. This would form a concentrated area of activity experienced from the adjacent surrounding slopes along with Càrn Dearg and An Lairig to the south. Additionally, there would be intervisibility with construction works at the lower reservoir from Beinn na Chlachair and Creag Pitridh. Such activities will interrupt the remote character and sense of wildness in a landscape where there is currently limited obvious human intervention, particularly around the upper reservoir and Leamhain Dam. The applicant considers the effect during construction would be locally Moderate – Major Adverse (Significant). This would be localised to an area around the Ardverikie Munros, between Beinn a' Chlachair and Creag Pitridh extending as far south as Càrn Dearg Such effects would be temporary.

7.75 Following construction the effects on this LCT would be reduced given the removal of the activities associated with works. The upper reservoir would be relatively contained by the surrounding landform and experienced mainly from higher slopes. The increased size of the loch would not appear incongruous within a landscape where lochs and lochans are common features. However, the linear form of the dam and visible drawdown area would increase the influence of manmade features within the landscape and contrast with the surrounding hills which may diminish the sense of naturalness and wildness. Whilst existing tracks are already present within the wider area new access tracks associated with the development would increase a sense of accessibility to the landscape which may contribute to a reduced perception of remoteness. These impacts can be minimised by reducing widths of tracks once operational and will be controlled by condition. There would also be some indirect effects relating to the appearance of the lower reservoir and dams from surrounding elevated areas which may increase a sense of development within the surrounding context. However, the applicant does not consider these effects would be Significant.

7.76 The applicant considers there will be a localised Moderate Adverse (Significant) effect during both year 1 and year 15 of operation within the area surrounding the upper reservoir and north, facing slopes to the south of the Leamhain Dam. However, given the localised nature of effects, the overall effect on the LCT is predicted to be Minor Adverse (Not Significant) during operation.

7.77 Whilst the Landscape Officer considers the LCT has been appropriately assessed by the applicant as High value and Medium-High sensitivity they consider the effects on this LCT has been understated. Due to the scale and form of the Leamhain dam, draw-down zone, fluctuating water levels and the presence of associated infrastructure, the assessment of Medium Magnitude of change after the construction period is not agreed. The dam and increased water body will remain obviously constructed artefacts with the broad draw down zone revealing not only the natural rock landform but areas

which have been excavated for borrow pits along with the concrete upstream face of the dam. The constant fluctuation of water levels in itself would be an obviously artificial process within the landscape which the Landscape Officer notes cannot mitigated by the passage of time.

7.78 The downstream face of the dam, with stone cladding, lies on the landscape boundary between the Isolated Mountain Plateau and the adjacent Smooth Rounded Hills – Badenoch and Strathspey and would introduce a prominent constructed element into two landscapes which share a key characteristic of "limited man-made structures".

7.79 The localised changes in the landscape characteristics would represent an intensive change over a relatively limited area, but of an enduring nature, and therefore represent a High magnitude of change. The development, particularly the dam structures and extensive draw down zone, would be locally dominant features at considerable variance within the landscape landform scale and pattern. The Landscape Officer considers this should be considered Major Adverse (Significant) effect. Whilst this is a higher level of adverse effect than identified within the LVIA, the applicant's assessment concedes that there would be a Significant adverse effect.

7.80 The Landscape Officer considers the LVIA's reported Low or Negligible level of effect is appropriate for the remainder of the LCT given the proposed development would mostly be screened from view.

7.81 The Shuas Dam and Leamhain Dam works are located within LCT 86: Smooth Rounded Hills – Badenoch and Strathspey. The NatureScot 2019 Landscape Character Assessment describes the key characteristics of LCT 86: Smooth Rounded Hills – Badenoch and Strathspey as:

- Large rounded mountains with gentle slopes and smooth skyline, separated by U-shaped valleys and encircling a wide shallow basin and loch.
- Proximity to the higher craggy plateau makes the mountains appear relatively small.
- Mainly simple heath grassland vegetation, with a few regular shaped conifer forests at low levels and extensive peatbogs in basin areas.
- Homogenous vegetation cover and lack of features such as crags and corries emphasise the simple landform and openness and makes the scale of the mountains and distance difficult to discern.
- The enclosed central basin including Loch Pattack is a focal point.
- Few man-made structures.
- A sense of wildness due to open, remote character, lack of settlement and limited man-made features.

7.82 Parts of this LCT falls within Ben Alder, Laggan and Glen Banchor SLA and it also forms part of WLA 14 Rannoch – Nevis – Mamores – Alder. It is noted for its remote, upland qualities and provides some recreational opportunities although it is generally perceived as a transitional landscape type, experienced as a setting to some of the higher mountains of adjacent LCTs.

7.83 This LCT would be directly affected in two locations within its transitionary area with other LCTs with the construction around the Shuas Dam area, including other smaller scale intakes, aqueduct and diversion channel, working areas and the main construction compound on its downstream side along with the construction of the Leamhain Dam within a hanging valley above Loch Pattack. Whilst these features would directly affect the edges of the LCT the main effect on landscape character would be indirect through the visible appearance of these activities across more extensive parts of the LCT. Construction in adjacent LCTs of the powerhouse, tracks and other features around the lower reservoir, along to the upper reservoir and surge shaft would also be experienced from parts of this LCT.

7.84 During construction, the additional activities associated with these works would increase evidence of active land use and draw the eye towards these areas, interrupting the simple landform, particularly within the sub-section of the LCT near the Shuas Dam. The Leamhain Dam would be intervisible with a larger area around Loch Pattack and surrounding facing slopes but would appear more focussed within the mountain backdrop. Nevertheless, the works would be distracting within the remote upland landscape and would affect perceptions of wildness (see also the WLA Assessment Appendix 7.6 summarised in paragraphs 7.9.29 – 2.9.46).

7.85 The applicant considers the effect during construction would be Moderate Adverse (Significant) within the Loch Earba LCT sub-section and locally within the Loch Pattack subsection, affecting the area within the bowl landform around Loch Pattack, up to between approximately 4km to 5km from the Leamhain Dam.

7.86 Following construction, the vegetated downstream face of the Shuas Dam would help it integrate within the valley setting longer term with the permanent intake and outlet structures appearing as relatively small within the landscape. Other areas disturbed for construction works would be reinstated. Woodland planting proposed downstream of the dam would also mitigate the visual effect and help to soften the appearance of these features within this LCT. The transition between this LCT and the neighbouring LCT 87: Small Craggy Knolls and Hills would be reinforced by the dam with the overall effect on landscape character considered to be relatively limited. Further planting proposed as part of Biodiversity Net Gain adjacent to Binnein Shuas would create additional change to this sub-section of the LCT but will not appear incongruous given that plantation woodland plantation is already an existing feature within the wider landscape.

7.87 Whilst the creation of the Leamhain Dam would introduce a prominent new focus on the edge of the Loch Pattack sub-section this would appear as a relatively simple, focused feature within the western context of mountains. It would generally sit below the skyline when seen from the valley below and would be skylined from surrounding areas in close proximity only. Within the context of Loch Pattack, although the dam would be prominent it would not detract from the role of the loch as a focus within the valley as it would combine with the surrounding landform to create a backdrop. Longer term, the proposed development is not considered to have a significant effect on wildness within the wider area around Loch Pattack given the existing influence of human interventions within the landscape such as tracks and plantation forestry. However, it would continue to form a conspicuous man-made focal point within the

upland, mountainous landform.

7.88 The applicant considers these effects would continue to be Moderate Adverse (Significant) within this sub-section to the west of Loch Pattack during operational year 1 and year 15, where the Leamhain Dam would be a very prominent new focus. Outwith this localised area the effect would otherwise be Minor – Moderate Adverse (Not Significant) at both year 1 and year 15 of operation.

7.89 Whilst the Landscape Officer considers this LCT has been appropriately assessed by the applicant as Medium value and sensitivity they consider the applicant has understated the effects on this LCT. The Loch Earba sub-section would be directly affected by the downstream face of the Shuas dam and associated diversion channels and tracks. They consider this would represent intensive change in relation to the size of this sub-section. Whilst the larger Loch Pattack sub-section would have fewer direct affects from tracks the downstream dam face would be a very dominant feature locally, suspended on the valley side above Loch Pattack and contrasting in form with the surrounding slopes. Again, they consider this should be characterised as an intensive change over a more limited area.

7.90 For both subsections the Landscape Officer considers the construction period magnitude of change would be High. In the Loch Earba subsection the change would initially be locally High at operational year 1, tapering somewhat with the vegetation of the downstream face of the Shuas dam and establishment of the new tree planting to reach locally Medium by operational year 15. They consider the magnitude of change assessment for this sub-section within the LVIA is unclear. For the Loch Pattack sub-section, at operational year 1 the magnitude of change would remain locally High, but with recovery of vegetation below and to the sides of the dam, along with some weathering of the cladding to its face, this would moderate to locally Medium, remaining a notable change to a localised area.

7.91 In considering the significance of effects, it is likely that the Leamhain Dam would have some effects on taking away from the role of Loch Pattack as a focus within the valley. The loch sits in a natural position in the base of the valley, while the proposed dam cuts off a hanging valley and itself would seem suspended in a surprising and potentially incongruous way, historically untypical to the formation of existing dams within Highland landscapes. Therefore, the Landscape Officer notes the dam would be a discordant and potentially unsettling prominent feature which would inevitably draw focus away from Loch Pattack, particularly in the years before the dam face weathers. They consider the visualisations for VL10 – Track to Loch Pattack and VL11 – Gael Charn summit appear optimistic with regards to the recessive colouration which is applied to the dam face and it is likely that the dam would be far more prominent than this suggests, particularly in the early years. Additionally, they note vegetation colour is not static, changing throughout the year, and a dam which is well blended and recessive during Autumn may be much more apparent in Spring or in snow conditions.

7.92 The Landscape Officer considers the Loch Earba sub-section would be likely to experience locally Major adverse effects during construction along with the early post construction years, reducing to locally Moderate as vegetation becomes embedded brining further mitigation. For the operational lifetime of the development, they consider the effects would remain locally Significant in contrast to the LVIA which reduces them

no non-significant post-construction.

7.93 It is considered that the Loch Pattack sub-section would experience locally Major adverse effects during construction in a relatively localised area around the Leamhain dam with locally Major adverse effects continuing into the early post construction years. With no active mitigation planting proposed in this area the transition to the lower level of effects will be dependent on the success of the establishment of vegetation in the construction area along with the gradual, subtle changes to the face of the dam from weathering and growth of moss and lichens which will make the development more recessive. These mitigation measures will be slower to take effect than mitigation measures at the Shuas dam sub-section. As such, the Landscape Officer considers it is likely that the effects will remain higher for longer and may remain locally Major-Moderate adverse at year 15. Whilst this is a higher rating of adverse effect over a longer duration than that identified within the LVIA, the applicant's assessment concedes that there would be a Significant adverse effect.

7.94 Works associated with the Shuas and Shios Dams including the powerhouse, tracks, processing of rock which to form the new promontories along with various compound and borrow pit areas are located within LCT 87: Small Craggy Knolls and Hills. The NatureScot 2019 Landscape Character Assessment describes the key characteristics of this LCT as:

- Craggy hills with frequent outcrops and rocky incised glens with some deep rocky gorges;
- Diverse, intricate and small-scale landscape in contrast to the large scale and simplicity of form and texture of surrounding smooth mountains and plateaux;
- Water is a key feature, occurring as lochans, waterfalls, meandering rivers and burns;
- Variable landcover with woodland and forest as key components particularly in the north, and more open ground of grasslands with scattered trees and peatlands around Loch Earba and the upper course of River Pattack;
- Land use is mainly deer grazing and forestry;
- Uninhabited landscape with few human artefacts;
- The viewing experience alternates from open distant views of surrounding mountains to those which are enclosed by trees and landform, focusing on local detail; and
- Rivers and lochs form natural features in views, as do dykes, bridges and metal fences in more managed areas;

7.95 The area in the south around Loch Earba and the upper River Pattack has a sense of wild character due to rugged and seemingly natural landscape and few human artefacts.

7.96 A portion of this LCT falls within Ben Alder, Laggan and Glen Banchor SLA and overlaps with WLA 14. Rannoch – Nevis – Mamores – Alder. The LCT is valued for its scenic qualities, associated with its diversity, small-scale character and prevalence of water, which also provides some recreational opportunities.

7.97 The proposed lower reservoir would occupy the Loch Earba LCT sub-section and would involve raising the water level of the existing two parts of Lochan na-Earba through the construction of the Shuas Dam (on the boundary of the LCT) and Shios Dam. The powerhouse would also form a new feature towards the south-western end of the loch with the creation of a new rock cutting and permanent new access tracks would around the new reservoir. The modification of Loch Earba would increase the size of the waterbody and result in the two lochs merging with the loss of some trees. However, the proposed promontories seek to maintain an element of visual separation of the lochs, particularly when looking along the valley.

7.98 The fluctuation in water levels during operation would also result in periodic drawdown visible along the loch shoreline. This sub-section of the LCT would be a focus for construction including site compounds, borrow pits, works to construct the dams, powerhouse and the upgrading, construction and use of access tracks by construction traffic which would add increased activity and movement on all sides of the lochs. The ZTV submitted shows extensive intervisibility of both Shios Dam and Shuas Dam throughout the Loch Earba valley. However, this would be largely limited to the upstream faces of the dams, which would be mostly submerged during operation. Whilst the ZTV indicates theoretical visibility of the Shuas Dam to the north, this would be experienced locally only due to extensive tree cover within this area. Theoretical visibility of the powerhouse area is shown to be relatively extensive along the valley floor, and from facing slopes of Binnein Shuas and Binnein Shios to the north (VL9 - Binnein Shuas). However, the setting of the building cut into the sloping landscape would reduce the extent to which it would be seen within lower elevations within the valley.

7.99 New and upgraded tracks will be located throughout the valley around Loch Earba with track widths reduced following the completion of construction. Planting is proposed in this LCT along parts of the valley sides, on promontories and around the powerhouse area which will provide further mitigation. As this establishes the built features of the proposed development would appear less noticeable by year 15 of operation. The applicant considers the magnitude of change would be High within the Loch Earba sub-section of the LCT during construction. Following the reinstatement of disturbed areas they consider this would reduce to locally Medium around the permanent features including the dams and powerhouse operational year 1. Overall, after 15 years, with the growth of new woodland and re-establishment of vegetation they consider the magnitude of change would be Low–Medium by year 15 of operation.

7.100 During construction, the large-scale works and vehicular movements occurring throughout the Loch Earba area would result in a noticeable increase in activity changing the character from one of limited human intervention dominated by natural features to a very actively managed landscape. However, this would be a relatively temporary effect. When construction works have concluded and reinstatement undertaken, the effects associated with large-scale activity and movement would cease. The Shios Dam, Shuas Dam and powerhouse would introduce large permanent built structures into the landscape, which given their scale, may appear out of keeping with the local landscape patterns but the loch would balance the scale of the dams to some extent and conceal large portions on the upstream side. The powerhouse is cut into the sloping hillside above the loch with woodland planting providing further

screening. These new structures would introduce man-made forms into the landscape in addition to fluctuating drawdown around the loch along with new and upgraded access tracks increasing the sense of human influence in the topography reducing the perception of “naturalness”. However, the natural qualities of craggy, enclosing hills alongside the body of water would remain predominant through most of the valley.

7.101 The increased inundation area would also alter the proportions of the valley reducing the sense of depth, enclosure and separation between lochs. The addition of further woodland around the south western loch would also reduce the diversity of character between the two lochs and the transition into the more open moorland of the LCT 86: Smooth Rounded Hills – Badenoch and Strathspey to the southwest. However, this is effect is not necessarily given a diverse pattern of open and planted areas would remain. The introduction of two promontories on the lochside would help to maintain the visual sense of separation between the two areas of water, particularly when viewed laterally along the valley, which would relate to the existing pattern of the two lochs. Planting on the promontories would also help to establish the existing pattern of trees and small promontories on the shores of the loch which contribute to striking valley views. The downstream face of the Shios Dam would require a section of concrete spillway but otherwise be clad in topsoil and vegetated to assimilate into the surrounding landscape downstream and reduce effects in this area.

7.102 The applicant considers the effect on the Loch Earba LCT sub-section to be Moderate–Major Adverse (Significant) during construction. They consider this would reduce to locally Moderate Adverse (Significant) in year 1 of operation at the south western part of the valley around the powerhouse and Shuas Dam with this reducing to Minor–Moderate Adverse (not significant) elsewhere. After 15 years, following the growth of woodland planting along with the full re-establishment of vegetation, the applicant considers the overall effect will be Minor–Moderate Adverse (not significant) given the predominant character of the waterbody, set within wooded slopes and craggy hills would be maintained.

7.103 The Landscape Officer considers this LCT has been appropriately assessed by the applicant as Medium-High value. When considering the Magnitude of Change the LVIA states that the upstream faces of the Shios Dam and Shuas Dam will be “mostly submerged during operation”. The Landscape Officer noted that the filling and emptying of the loch is the intrinsic to the purpose of the development therefore the degree and duration of visibility will be dependent upon the operational schedule and they typical lowest fill level. The drawings provided show a range of 21m between the maximum and minimum fill levels. Additionally, they considered the speed of the emptying and refilling of the waterbody to be unclear. This requires consideration as this dynamic process has the potential to have an effect on the perception of the landscape. On this particular point, as previously described, the applicant noted that fluctuations in water level at each reservoir would be subject to the demands of the electricity market and could vary considerably day to day.

7.104 The Landscape Officer considers assessed magnitude of change after construction is overly optimistic and relies heavily on swift and successful reinstatement of disturbed areas. The presence of the dams, change to the waterbody given the new and dynamic cyclical fill sequence along with the introduction of new artificial promontories represent an intensive change over a relatively high proportion of the Landscape Unit. Taking these factors into account they believe a more conservative approach is

required and consider the magnitude of change will be locally medium-high in operational year 1 which would then reduce to locally medium by operation year 15.

7.105 The LVIA proposes that the large structures of the dams and power house may appear slightly out of scale with the local landscape patterns and that this will be to some extent balanced by the larger body of water, while also proposing that the new promontories would help to maintain the visual sense of separation between the two areas of water. The Landscape Officer noted there appears to be conflict between these ideas as visual separation needs must limit the degree to which the waterbody is seen as larger. Notwithstanding this potential conflict, they considered the increased scale of the waterbody is itself a change to the character of the landscape which would combine with the scale of the dams to form a single, larger scale entity. They felt the LVIA did not fully explain how this would reduce or mitigate either the effect or the significance of the changes to the landscape. The landscape is characteristically small scale and intricate, therefore, the creation of one large loch from two small lochs diminishes the small scale and intricacy experienced within a large part of the LCT.

7.106 The Landscape Officer considers the promontories, as currently designed, have a limited effect on retaining any sense of two lochs. Whilst they may have been designed as flat promontories to emulate Am Magh's relatively level landform the artificially regular side slopes and deep draw-down zone would risk, in combination with the flat top, making the entire construction appear artificial. The applicant has taken these points on board and is open to a more appropriate design solution to make the promontories appearance more naturalistic, with this recommended to be controlled by condition.

7.107 Considering these aspects, the Landscape Officer agrees with the applicant that the landscape effect on the Loch Earba sub-section will be locally Moderate-Major adverse. However, they consider the proposed mitigation measures are unlikely to be sufficient to reduce the effects by a notable degree in the early post construction years given features such as the draw down scar and the dynamic fill cycle new features within the landscape with little scope for mitigation measures. Therefore, the Landscape Officer considers the operational year 1 effects would remain locally Moderate-Major abating over time with the successful planting and regeneration to locally Moderate adverse by operational year 15. It is considered that this would then remain a Significant effect, in contrast to the applicant’s assessment as non-significant, given the character of the new waterbody being intrinsically different to its predecessor twin lochs.

7.108 The Landscape Officer is in agreement with the applicant that the effects for the remaining LCTs is not significant, these include LCT 88: Loch and Glen, LCT 89: Broad Loch and Glen, LCT 126: Upland Glen – Cairngorms, LCT 236: Smooth Moorland Ridges and LCT 238: Rugged Massif – Lochaber.

7.109 Whilst the Landscape Officer considers the applicant has understated some of the landscape effects, when considered in the round, they are generally acceptable subject to additional mitigation measures which can be secured by condition.

Wild Land

7.110 There are Wild Land Areas (WLA) within the study area with the closest being WLA 14:

Rannoch-Nevis-Mamores-Alder, with the vast majority of the site boundary located within the designation. Assessment of WLA 19: Braeroy – Glenshirra – Creag Meagaidh, located approximately 1km north of the proposed access beyond the A86, has been scoped out of the assessment in agreement with NatureScot as the potential for significant effects is unlikely.

WLA 14: Rannoch-Nevis-Mamores-Alder

7.111 This is the third most extensive WLA identified in Scotland measuring 1,180km^2. It contains a number of mountain ranges and peatland areas reflecting its wide geographical and altitudinal range. With 40 Munros and 13 Corbetts many hillwalkers and climbers target the mountain tops, ridges and cliffs with others, such as mountain bikers, attracted to lower-lying estate tracks and paths. Many parts of the WLA are of high scenic value, recognised by being within the Ben Alder, Laggan and Glen Banchor Special Landscape Area (SLA), and overlapping with the Cairngorms National Park in the far east. Descriptions for these areas recognise the distinctive characteristics of the peatland, lochs and mountains.

7.112 The proposed development will be located within WLA 14: Rannoch-Nevis-Mamores-Alder with the exception of the Shios Dam and surrounding works which will be just outside and to the northeast extent of WLA 14.

7.113 The key attributes and qualities of the wild land area (Wild Land Qualities (WLQ)) are noted as:

- WLQ 1 - Mountain ranges and glens of varying landform, but all arresting, with towering, steep and rugged slopes and striking physical features;
- WLQ 2 - A strong contrast of wide open peatland, lochs and steep-sided mountains that highlight the visibility and awe-inspiring qualities of each;
- WLQ 3 - A strong contrast of wide open peatland, lochs and steep-sided mountains that highlight the visibility and awe-inspiring qualities of each
- WLQ 4 - An extensive and remote mountain and peatland interior with a strong sense of sanctuary, appearing even larger due to distant views to surrounding wild land areas;
- WLQ 5 - A large area which is visited by many people to experience wild land qualities in different ways, whilst maintaining a sense of remoteness, sanctuary, challenge and risk; and
- An extensive pattern of lochs, lochans, burns and bog that highlight the ruggedness of the landform, limit access and contribute to the sense of naturalness.

7.114 The applicant has undertaken an assessment of effects on WLA 14 (EIAR Volume 4 Appendix 7.5). This assessment has been carried out following previous advice from NatureScot as part of the Scoping response which has included all the above, apart from WLQ 2.

7.115 The applicant's assessment concludes that there would be no significant effect on WLA 14 as a whole, however, they concede that there would be significant localised

residual operational effects on two of the four WLQs assessed. WLQ1 and WLQ5:

- WLQ 1 – A localised significant effect around Loch a'Bhealaich Leamhain and on the downstream side of the Leamhain Dam within 2-3km from the proposed development; and
- WLQ 5 – a localised significant effect within the Loch a'Bhealaich Leamhain and Lochan na hEarba areas.

7.116 Given the predicted visibility of the proposed development over WLA 14 and the susceptibility of WLQs within this area of visibility NatureScot have undertaken further work to more fully understand the extent of effects on the qualities of WLA 14 and have undertaken their own appraisal.

7.117 A ZTV has been produced to show the dams, powerhouse and the access track proposed which would link the Shuas Dam and the upper reservoir all separately. The former ZTV shows that there would be predicted visibility of the proposed development within the WLA 14 over the full extent of Lochan an h-Earba and the surrounding slopes and summits of Binnein Shuas, Binnein Shios, Creag Pitridh, Beinn a 'Chlachair, Gael Charn and further south over the ridge running from Beinn Eibhinn over Aonach Beag to Geal Charn and Carn Dearg. To the south-east there would be visibility over the summits and northwest facing slopes of the mountains surrounding Loch Ericht, north of Corrievarkie.

7.118 NatureScot consider separating out of the visibility of component parts of the proposed development is beneficial in understanding which individual elements of the proposal would be visible over WLA 14. The dams ZTV shows that there would be a clear division in visibility over WLA 14 between the upper Leamhain dam and lower Loch Earba dams resulting from the physical separation of these elements of the proposal. NatureScot therefore consider there to be two study areas relevant to the proposal within WLA 14, which forms the focus of their appraisal of effects. They have defined these as:

- Study Area 1 – the area represented by wild land assessment points WL1, WL4 and WL53 associated with the Shuas and Shios dams, Loch Earba inundation, powerhouse and associated infrastructure; and
- Study Area 2 – the area represented by wild land assessment points WL2, WL3, WL6 and WL79 associated with the Leamhain dam, inundation and associated infrastructure.

WLA 14 – Study Area 1

7.119 Study Area 1 is located towards the north eastern extent of WLA 14 where WLQs 1, 4 and 5 are present in the baseline. The wild land assessment points WL1, WL4 and WL5 are representative of this area from which there would be visibility of the proposed Shuas and Shios dams, spillway, powerhouse, promontories, aqueducts and associated infrastructure to include maintenance access tracks. From this study area there exists a baseline influence of human artefacts in the form of access tracks to and along the southern shore of Loch Earba and some localised small scale hydro infrastructure in the form of weirs and sluices.

7.120 The area around Loch Earba is well visited given its relative ease of access from the A86 around Moy and affords a more accessible experience of wild land. NatureScot note whilst these elements diminish the physical challenge and sense of remoteness in this area, the surrounding landform provides a strong sense of perceived sanctuary and overall tranquillity to the Loch Earba basin. Binnein Shuas and Binnein Shios serve to effectively screen and contain development to the north-west with the Ardverikie Munros providing containment to the south-east. NatureScot consider the introduction of large scale man-made development in the form of the proposed dam structures, powerhouse and associated infrastructure would significantly affect the sense of sanctuary of WLQ 4 exhibited in this area.

7.121 When experienced from the Loch Earba basin there is a high degree of ruggedness expressed in the surrounding mountain landforms, which combined with the natural form of Loch Earba, amplifies the sense of naturalness of this area. Whilst existing evidence of human artefacts, in the form of access tracks and small-scale hydro infrastructure, has had some effect on the sense of naturalness, this influence is relatively minor in terms of the overall experience of naturalness expressed in the Loch Earba basin. NatureScot consider that the proposed development would intensify human influence through introduction of largescale man-made infrastructure into an area which exhibits a high degree of naturalness. The drawdown area, dam structures, aqueducts and powerhouse would be widely experienced from the Loch Earba basin as obvious elements of human influence. The existing waterbody would also be substantially altered from its current form into a large scale reservoir, impacting on the sense of naturalness attributed to WLQ 5. Effects would be further compounded by the increase in access tracks around Loch Earba, the access track between the lower and upper reservoirs, and associated ancillary infrastructure. NatureScot consider the proposed development would significantly affect the sense of naturalness attribute of WLQ 5 in the Loch Earba basin.

7.122 From the summits of the Beinn a ‘Chlachair, Creag Pitridh, Geal Charn, Binnein Shuas and Shios, within the WLA, there is an evident experience of the more managed landscapes of Strath Mashie and Glen Spean which lie outwith WLA 14 to the north-east and north-west, respectively. The siting and scale of the proposed development would extend and intensify the experience of man-made development from these mountains which afford panoramic views out over Loch Earba. The perceived extent of WLA 14 would be reduced as a result of this encroachment. NatureScot consider the proposed development would reduce the perceived extent of WLA 14 when experienced from the Ardverikie Hills and Munros.

WLA 14 – Study Area 2

7.123 Study Area 2 is located further into the interior of WLA 14 where WLQs 1, 4 and 5 are present in the baseline. The wild land assessment points WL2, WL3, WL6 and WL7 are representative of this area from which there would be visibility of the proposed Leamhain dam, spillway and associated infrastructure to include maintenance access tracks.

7.124 From this study area there exists a baseline influence of contemporary land use and human artefacts around Loch Pattack, with commercial forestry present to the east of the loch and associated land management tracks. Whilst this existing baseline of

human influence has contributed to some weakening of the attribute of naturalness of WLQ 1 this is contained to low-lying areas around Loch Pattack. The proposed Leamhain dam would intensify human influence through introducing large scale man-made development outwith the glen floor and into an area where the attribute of naturalness is well expressed. NatureScot consider that the scale of the proposed dam would significantly affect the naturalness of the Ardverikie Munros when experienced from this area due to the siting of a highly visible man-made development within the natural, rugged bealach landform between Gael Charn and Beinn a 'Chlachair. The 1.2km long and approximately 100m high rockfall dam structure, at its highest point, would be highly visible from these locations as an obvious element of human influence and would reduce the perceived extent of WLA 14. NatureScot consider the proposed development would interrupt the experience of the expansive panoramic views from Loch Pattack out over the interior of WLA 14. These effects would be further compounded by the access tracks and spillway which would be clearly visible on the south-east facing slopes of the downstream side of the proposed Leamhain Dam.

7.125 There would also be a significant effect on the attribute of naturalness of WLQ 5 in relation to Loch a' Bhealaich Leamhain. Experience of this naturally formed lochan and its rugged surrounds would be altered by the proposed man-made dam structure and prominent 70m high drawdown scar which would result from the impoundment and associated fluctuation in water levels. The proposed associated built infrastructure and access tracks would intensify these effects. NatureScot considers the proposed development would significantly affect the attribute of naturalness of WLQs 1 and 5 through the introduction of large scale man-made development at elevation, outwith the basin floor within the natural, rugged bealach landform between Gael Charn and Beinn a 'Chlachair, where the attribute of naturalness is well expressed.

7.126 The existing human artefacts present around Loch Pattack, and proximity to Ben Alder Lodge, has diminished the fulfilment from the physical challenge and sense of remoteness attributed to WLQs 4 and 5. However, there still exists a sense of physical separation from the "modern world" which increases south west from Loch Pattack into the interior of WLA 14. This is due to the distance travelled and long journey required to access this area on foot via both Loch Ericht and Ardverikie. There also exists a strong sense of sanctuary and resultant tranquillity exhibited in the area surrounding Loch Pattack resulting from the contrast between the low lying basin and loch, and the enclosure afforded by the rugged, awe-inspiring surrounding mountains. A clear sense of moving into a remote interior area is also experienced with attributes of risk, solitude and sanctuary becoming more pronounced when journeying south-west. NatureScot consider that the proposed development would significantly affect the perceived sense of sanctuary of WLQ 4 which is experienced when moving into the interior of WLA 14 through extending the experience of human artefacts into an area where these qualities are well expressed.

7.127 Additionally, there would also be a sequential cumulative effect of hydro development alongside the River Pattack Hydro scheme which would be experienced when accessing this area from Ardverikie. This would further erode the attributes of naturalness and sense of remoteness, given the long journey required to reach this area. The perception of sense of sanctuary would also be weakened. NatureScot consider the effects on the attributes of naturalness of WLQs 1 and 5 and sense of sanctuary of WLQ 4 would be incrementally eroded by the intensifying cumulative

effects from current contemporary land use within the north-east area of WLA 14.

7.128 In terms of mitigation measures proposed the wild land assessment sets out a summary of landscape mitigation measures which have informed the design in relation to effects on WLA 14. Including a high standard of restoration, considered selection of materials, track design and narrowing where possible following the construction phase, and native woodland planting proposals.

7.129 Whilst NatureScot welcome these measures put forward and the consideration of mitigation through design, they consider that these do not fully demonstrate appropriate measures for the reduction of effects on WLA 14 given the location of the proposed development within this highly sensitive landscape. NatureScot's "Assessing Impacts on Wild Land Areas" technical guidance (2024) sets out examples of potential mitigation measures for the reduction of effect:

- Rationalise the spatial extent or scale of proposal or parts of the proposal;
- Sensitive siting of components;
- A high standard of design; and
- A high standard of restoration.

7.130 Generally, NatureScot consider that the scale of the development in relation to the receiving landscape and its susceptibility to development of this nature does not appear to have been fully considered during the design development stage. This is reflected in the design evolution refinements made since Scoping stage which have increased the scale of development.

7.131 Whilst there has been demonstration of consideration given to reducing access track widths following construction, further track rationalisation, for example by using existing access tracks or exploring alternative means of access, would further reduce residual effects from maintenance access tracks on WLA 14.

7.132 Whilst the proposed powerhouse has been developed to concept design stage, given the scale of this element of the proposal and the extensive cutting and earthworks required to the lower slopes of Creag Pitridh to facilitate the works, NatureScot consider that alternative methods of construction should be considered such as undergrounding development. This would further reduce effects from this component of the development where visibility is predicted over Binnein Shuas, Binnein Shios and the wider Loch na h-Earba basin. The finalised design of the powerhouse can be controlled by condition.

7.133 NatureScot consider the proposed promontories formed from excess spoil go some way to reflect the existing physical and visual break in Loch na h-Earba, however, as with Highland Council's Landscape Officer they consider these to be engineered in design. Revisiting the design of the promontories with an organic design approach would ensure that these landforms relate to the surrounding landscape and reduce effects on the attribute of naturalness expressed in this area. The finalised design of the promontories is recommended to be controlled by condition.

7.134 Whilst the applicant refers to high standards of reinstatement following the construction NatureScot have concerns regarding the implementation of this given the standard of

reinstatement measures in relation to the Pattack Hydro Scheme when travelling through Ardverikie, towards Loch Pattack and into the interior of WLA 14.

7.135 As such, whilst NatureScot welcome the measures put forward and the consideration of mitigation through design, it considers that this does not sufficiently demonstrate a reduction of effects with regard to the highly sensitive landscape of WLA 14.

7.136 Even with the concerns raised in relation to the significant adverse effects on WLQs 1, 4 and 5, NatureScot has not raised an objection. This is subject to conditions having considered various other interests and taken them into account in reaching their conclusion.

7.137 In particular, NatureScot has considered the strategic importance of the proposed development in meeting Scottish Government renewable energy targets, taking into account NPF4 as a whole and the size and scale of the development. Additionally, they also considered the comprehensive nature of the accompanying outline Biodiversity Enhancement Plan and Peatland Restoration Plan which will lead to significant enhancement across the wider area.

7.138 A significant proportion of the representations received raising objection to the proposed development noted the detrimental impacts on WLA 14. These came from members of the public, Laggan and Spean Bridge, Roy Bridge and Achancarry Community Councils along with groups with recreational interests such as Mountaineering Scotland, Jonh Muir Trust and Scottish Wild Land Group. They noted Munros and paths in the wider surrounding area which are well used for recreation including hillwalking, climbing cycling and snowsports. They considered the high degree of perceived naturalness will be lost during the construction phase with the imposition of construction compounds and associated noise and traffic, permanent access tracks, lighting, blasting and quarrying for materials, disruption and loss of the natural river course and the creation of Shios Dam, Shuas Dam and powerhouse at Loch Earba and the Leamhain Dam at Loch a' Bhealaich Leamhain.

7.139 Representations stated that following the completion of works there will no longer be a lack of modern artefacts or structures within the landscape. They considered the rugged landform will change with the fluctuation in the water levels along with the appearance of drawdown scars at both the upper and lower lochs. Additionally, it was noted the feelings of remoteness and inaccessibility will be diminished from the construction of upgraded and new access tracks.

7.140 In summary, the wild land impact related concerns raised in representations mirror the findings of NatureScot, however, the government's technical advisor on wild land interests have confirmed that when taking into account NPF4 as a whole, and strategic importance of the proposed development towards renewable energy targets, they have no objection subject to the significant enhancement measures across the site and wider surrounding area. This is consistent with NPF4 Policy 4 g) which supports such development proposals within WLAs given they will support meeting renewable energy targets.

Cairngorms National Park

7.141 Cairngorms National Park (CNP) was considered further as part of the LVIA with EIAR

Volume 4 Appendix 7.4: Assessment of Cairngorms National Park). The CNP lies to the east of the proposed development with two small portions falling within the study area:

- An area of Strath Mashie and Glen Shirra and enclosing knolly hills approximately 4km to the north-east of the Shios Dam; and
- An area if Dalnaspidal Forest east of the ridgelines of the mountains of Geal-charn and Beinn Udlamain on the eastern side of Loch Ericht approximately 8.7km to the east/south east of the Leamhain Dam.

7.142 The proposed development would appear within the context of small areas on the fringes of the CNP, mostly affecting summits and lower hills along its boundary. These effects would be indirect and peripheral, affecting areas outwith the CNP. The proposal is not predicted to lead to any significant effects on the landscape character of the areas affected or to lead to significant effects on any of the SLQs of the CNP. The effect on the CNP is therefore considered to be Negligible during construction and during year 1 and year 15 of operation. This is agreed and not contested by Cairngorms National Park Authority (CNPA). It noted that under the working agreement CNPA has with NatureScot that NatureScot lead on providing landscape advice in relation to effects of development on the SLQs and landscape character of the National Park caused by any proposed developments outwith the National Park. As such, CNPA base its recommendation on the advice received from NatureScot. In this instance it has been concluded that the proposed development will not introduce any adverse effects on the SLQs and landscape character of the National Park.

Regionally Designated Landscapes - Special Landscape Areas (SLAs)

7.143 The site is within Ben Alder, Laggan and Glen Banchor SLA. The applicant considered there would be no long-term Significant effects on the SLA beyond the construction period. Highland Council's Landscape Officer generally agrees with the applicant's assessment that there are no long-term Significant effects on the Special Qualities of the SLA.

Ben Alder, Laggan and Glen Banchor SLA

7.144 The Council has designated Ben Alder, Laggan and Glen Banchor as an SLA. The Assessment of Highland Special Landscape Areas (2011) identifies the Special Qualities of the SLA as the ever changing compositions and historic landscape.

7.145 This SLA is located at the heart of the Central Highlands. It combines a series of attractive, predominantly wooded glens interspersed with small-scale farmlands, rising to moorland that leads to distinctive craggy summits and mountain plateaux which are of picturesque quality. Traditional estate farmsteads, cottages, castles and gatehouses occur throughout the glens and enrich the sense of history within the area. Contained in this area are two of Scotland's biggest and best known Munros (Ben Alder and Creag Meagaidh) and the varied constellation of peaks extending between them. The area includes Loch Laggan, with its unusual sandy beach, extensive areas of forest and distinctive baronial fairy-tale castle at Adverikie. It also includes the more rugged, southern part of Loch Ericht, Loch Pattack and a number of high corrie lochans.

7.146 Key Landscape Characteristic are noted as:

- This complex and diverse inland area combines an intimate sequence of wooded glens estate policies and lochs surrounded by rolling moorlands that lead to knolly hills, craggy ridges and coires and mountain plateaux.
- There is a strong contrast between the glens and the upland areas. In the glens, human influence is clearly apparent, for example in the distinct pattern of fields, enclosed by policy woodlands and forest plantations, and punctuated by buildings, conversely, the mountain and moorland areas are simple in land cover and possess wildness qualities.
- Within the glens, there is a diverse landscape character within the glens. This is derived from the variety of landform, woodland, agriculture, the presence of lochs, and the location of estate cottages, castles and gatehouses.
- The variable landform means that conifer plantations generally can integrate well with some of the open hillsides above. Cascading waterfalls, small gorges, rocky outcrops and a scattering of birch trees further link the moorland areas with glen floor below. The combination of these landscape elements with baronial architecture features can appear picturesque in character.
- A series of mountain ranges orientated to a south west – north east, and comprising of rocky summits and ridges and crossed by remote high bealachs, lead to the high plateau in the south. Throughout this area, an extensive network of hill tracks and paths, primarily for estate management, penetrate through the interior. These link remote glens over long high mountain passes through an area that has a strong sense of wildness.

7.147 The landscape assessment has established that during construction, there would be temporary, localised significant effects on the SLA. These will be focussed around the upper and lower reservoir areas and dams along with areas to the west of the Shuas Dam and South and East of the Leamhain Dam towards the summit area of Càrn Dearg and Loch Pattack up to approximately 4km. These effects would lead to some corresponding localised significant effects on both the SLA and WLA 14: Rannoch – Nevis – Mamores – Alder.

7.148 Significant effects during the construction phase would generally relate to the presence of large-scale construction, excavations and movement of plant and personnel within an upland and largely undeveloped landscape. After completion of construction and following restoration and mitigation measures the extent of significant effects would reduce to a more localised area around the permanent features of proposed development including the upper and lower reservoirs, dams, surge shafts and powerhouse. This would be assisted by mitigation and reinstatement measures including restoration of disturbed areas and re-establishment of vegetation, narrowing of tracks, landform around the powerhouse and other structures such as the surge shafts and the establishment of vegetation over the downstream sides of the Shuas Dam and Shios Dam. Over time, planting around the lower reservoir tracks, and particularly the powerhouse would further mitigate the longer-term effects in this area and after 15 years, whilst some localised significant effects are predicted around the powerhouse and Shuas Dam, wider significant effects on landscape character would be largely limited to an area within approximately 2km of the upper reservoir and Leamhain Dam.

7.149 The Landscape Officer agrees with the applicant that the effects on the SLA will be Moderate Adverse (Significant) during construction, reducing to Minor-Moderate Adverse (not significant) in operational year 1 and Minor Adverse (not significant) after 15 years. They agree there are no long-term significant effects on the Special Qualities of the SLA.

7.150 The cumulative assessment (EIAR Volume 1 Chapter 7 Section 7.1 Potential Significant Effects: Cumulative Assessment) has identified small portions within the study area where the landscape effects of the proposed development would be marginally increased if other proposed developments were considered within the baseline i.e. what is currently seen within the landscape acts as a starting point for comparison with any future changes. As such, cumulative effects are not significant. This is agreed. In summary, the scheme has therefore been well sited and designed with no lasting significant adverse effects on any of the special qualities of this SLA during the operational lifetime of the development.

Visual Impact

7.151 Large scale energy schemes would be expected to result in significant visual impact effects, however, such effects do not automatically translate to unacceptable effects. This is a matter of planning judgement when considering the merits of any given scheme. The applicant's assessment of effects on visual amenity has considered potential effects on visual receptors (people obtaining views) based in buildings and residential properties and areas, using transport and recreational routes and taking advantage of the views at defined outdoor viewing locations. Following a review of the applicant's Landscape and Visual Impact Assessment (LVIA), there are limited areas of difference between the assessment of officers and that of the applicant.

7.152 Appendix 4 provides a summary of the applicant's assessment and officer appraisal of this assessment, which highlights the differences and any concerns with regard to visual impact.

7.153 The applicant considers there would be no significant effects to the visual amenity of residents or other building-based visual receptors within the study area. This is agreed with the closest properties being Luiblea and Tòrgulbin approximately 285m and 325m to the west and south west of the new proposed access respectively. Both will have visibility of the new access and some associated infrastructure such as borrowpits or compounds but given the landform of the surrounding area the vast majority of proposed infrastructure will be hidden from view. There is no visibility from any nearby settlements.

7.154 The applicant considers there would be no significant effects to the visual amenity of road user visual receptors within the study area. Construction works would be experienced transiently by road users along the A86 seen in easterly views from approximately 2.5km of the route along the lower slopes of Meall Chaorach. This is agreed.

7.155 The cumulative assessment (EIAR Volume 1 Chapter 7 Section 7.1 Potential Significant Effects: Cumulative Assessment) has identified small portions within the study area where the visual effects of the proposed development would be marginally increased if other proposed developments were considered within the baseline. As

such, cumulative effects are not significant. This is agreed.

7.156 The significant adverse visual affects of this development are therefore confined to recreational and other users of outdoors away from areas of habitation.

Impacts for Recreational and Other Users of Outdoors

7.157 During construction, short to medium term significant adverse effects would occur where recreational users would pass adjacent to the reservoirs and dams, would overlook the key areas of construction from surrounding mountains or where works would feature prominently in the hills above. In some cases, parts of these routes would also be upgraded and used by construction traffic. During construction, the applicant has identified Significant adverse effects for recreational receptors at 8 of the visualisation locations within a radius of 5km. These are:

- VL3 – Carn Dearg summit
- VL4 – Creag Pitridh summit
- VL5 – Beinn a' Chlachair summit
- VL6 - Proposed access track to North East of Loch Earba
- VL7 - Proposed access track to south-east of Loch Earba
- VL8 – West of Loch a' Bhealaich Leamhain
- VL9 – Binnein Shuas, near summit
- VL10 – Track to Loch Pattack

7.158 Whilst it is considered the applicant has understated some elements of their assessment it is agreed that there will be Significant effects for receptors at these locations during construction.

7.159 Additionally, the applicant has identified no significant effects for recreational receptors at 3 of the visualisation locations during construction. These are VL1 - Carn Liath summit, VL2 - Beinn a' Chaorainn summit, and VL11 – Gael Charn summit. Whilst it is considered the applicant has understated some elements of their assessment it is again agreed that there will be no significant effects for receptors at these locations.

7.160 During short term operation, year 1, the applicant considers visual effects would be reduced and Significant effects would be limited to:

- users of tracks directly alongside the lower and upper reservoir, VL6 - Proposed access track to North East of Loch Earba, VL7 - Proposed access track to south-east of Lochan na h-Earba and VL8 – West of Loch a' Bhealaich Leamhain
- hill routes immediately overlooking the reservoirs, VL3 – Carn Dearg summit, VL4 – Creag Pitridh summit, VL5 – Beinn a' Chlachair summit and VL9 – Binnein Shuas, near summit. VL10 – Track to Loch Pattack looks up towards the Leamhain Dam.
- Over time, by year 15 and for the remaining operational lifetime of the development, proposed woodland planting, landscaping and other mitigation

measures around Loch Earba are reported to reduce the visual effects to recreational users in this area and these effects are predicted to become not significant after 15 years. The applicant considers that the only residual longer term Significant adverse effect would be for recreational receptors within close proximity to the upper reservoir at Loch a' Bhealach Leamhain, represented by VL3 – Carn Dearg summit, VL10 – Track to Loch Pattack and VL8 – West of Loch a' Bhealaich Leamhain.

7.161 During short term operation, year 1, in addition to the applicant's reported Significant adverse effects which are not disputed, it is considered that the applicant has understated when Significant effects for people at other receptor locations will diminish. At operational year 1, additional Significant effects would also occur at VL4 – Creag Pitridh summit and VL5 – Beinn a' Chlachair summit. At these locations the applicant's assessment is overly optimistic to assume landscaping, planting, weathering and other mitigation measures would take sufficient effect to avoid such impacts.

7.162 Landscaping, planting, weathering and other mitigation measures will have taken effect after 15 years of operation, therefore the visual impact of the powerhouse, Shuas Dam and Shios Dams and associated tracks seen around Loch Earba will be less influential within the landscape. Whilst the drawdown zone will continue to have an impact throughout the operational life of the proposed development, it is less extensive in the lower reservoir in comparison to the upper reservoir (with a worst-case visual scar of approximately 22m as opposed to approximately 70m drawdown zone). Whilst it is considered the applicant has understated some elements of their assessment, it is agreed that there will be no significant effects for receptors at these locations around the lower reservoir longer term.

Impact on Recreational Routes

7.163 Owing to the site location, all selected visualisation locations are representative of views obtained from recreational users of the outdoors. The 11 visualisation locations are included along six walking routes:

- Càrn Liath, Stob Poite Coire Ardair and Creag Meagaidh mountain route (R3) for VL1 - Carn Liath summit.
- Beinn a' Chaorainn and Beinn Teallach mountain route (R4) for VL2 - Beinn a' Chaorainn summit.
- Beinn a ' Chlachair, Geal Charn and Creag Pitridh mountain route (R6) for VL4 - Creag Pitridh summit and VL5 - Beinn a ' Chlachair summit.
- Loch Earba track (R8) for VL6 - Proposed access track to North East of Lochan na h-Earba and VL7 - Proposed access track to south-east of Lochan na h-Earba.
- Loch Leamhain to Loch Pattack path (R9) for VL8 – West of Loch a' Bhealaich Leamhain.
- Geal-charn and A' Mharconaich mountain route (R10) for VL11 - Geal-charn summit.

7.164 These six upland walking routes are assessed during construction of the proposed development, where recreational users would pass adjacent to the reservoirs and dams, would overlook the key areas of construction from surrounding mountains, or where works would feature prominently in the hills above. In some cases, parts of these routes would also be upgraded and used by construction traffic.

7.165 During operation, the visual effects would reduce and would be limited to users of tracks directly alongside the upper and lower reservoir, and hill routes immediately overlooking the reservoirs. Over time, proposed woodland planting around Loch Earba would reduce the visual effects to recreational users in this area and these effects are predicted to become not significant after 15 years. Long term significant effects are therefore only expected to occur for recreational receptors within close proximity to the upper reservoir at Loch a' Bhealach Leamhain and surrounding upland routes and summits extending to a localised area of approximately 4km to 5km. This is generally agreed.

7.166 The following visualisation locations have been analysed further given the likely potential short and longer term Significant effects experienced at the upper reservoir from the surrounding visualisation locations. Additionally, the visualisation locations at the lower reservoir highlight the disparity between the applicant's assessment and the case officer's appraisal.

7.167 For the upper reservoir, Mountain Route R14 to Carn Dearg, GealCharn, Aonach Beag and Beinn Eibhinn which connects Dalwhinnie with the four Munro summits and encompasses part of Scottish Hill Track 155 – (Corrour Station to Dalwhinnie or Kinloch Laggan) and a small section of Scottish Hill Track 155b (Loch Rannoch to Kinloch Laggan). From the Pattack valley and shore of Loch Pattack, the Leamhain Dam and associated tracks would be visible in a corrie to the west. Leamhain Dam and inundation area would also be visible to varying degrees from elevated parts of the route, along the ridgeline between the summits of Carn Dearg, Aonach Beag and Beinn Eibhinn. Construction works and activity from these areas would be particularly apparent. Whilst the attraction of a section of the route will be diminished during the construction phase of the proposed development, extensive, valued views of surrounding mountains would continue to be obtained from this route in the longer term and the majority of the route would not be affected once the proposed development was operational.

7.168 VL3 - Carn Dearg is a Munro summit to the south of the development within both WLA 14 Rannoch-Nevis-Mamore-Alder Wild Land Area and Ben Alder, Laggan and Glen Banchor SLA. This is representative of views of the upper reservoir from this and other Munro summits such as Geal Chàrn, Aonach Beag and Beinn Eibhinn.

7.169 From Carn Dearg summit there are panoramic views across surrounding glens and mountain summits, with Loch Pattack notable to the north east, Loch Ericht to the east and Loch Leamhain to the north.

7.170 From this visualisation location the construction phase will be particularly noticeable and distracting where visible. There will be various elements of activity around Loch Leamhain for the construction of the Leamhain Dam, upper intake, construction and use of associated tracks, compound areas and borrow pits. This would form a

concentrated area of works experienced from Carn Dearg along with surrounding slopes.

7.171 Post construction of the upper reservoir, it would generally appear relatively contained by the surrounding landform and experienced mainly from higher slopes. The increased size of the loch would not appear out of keeping within a landform where lochs and lochans are common features. However, the linear form of the Leamhain Dam and visible drawdown area would increase the influence of manmade features within the view and contrast with the surrounding hills would diminish the sense of naturalness and wildness from this view. Whilst the curvature of Leamhain Dam follows the surrounding contours to a certain extent, and is somewhat contained by the landform, the dam wall will still appear stark within the landscape. Leamhain Dam is a substantial structure with the external dam wall extending to approximately 80m in height. When viewed alongside the significant 70m drawdown zone there will be Significant visual impacts with limited mitigation available. There will be a slight greening and weathering to the dam face over time.

7.172 Whilst existing tracks are already present within the wider area, new access tracks associated with the development would be seen in the view. As noted, these impacts can be minimised by reducing widths of tracks once operational.

7.173 The effects will be Significant from the construction period and throughout operational years 1 and 15.

7.174 R9 Loch Leamhain to Loch Pattack path connect to other recreational routes (R6 Mountain Route to Beinn a’ Chlachair, Geal Charn and Creag Pitridh and R14 Mountain Route to Carn Dearg, GealCharn, Aonach Beag and Beinn Eibhinn). Construction works and activity from these areas would be very noticeable, particularly works for the Leamhain Dam when ascending the route from Loch Pattack. Additionally, parts of this route would also be widened and used for construction traffic. Therefore, the attraction of a section of the route will be diminished during the construction phase of the proposed development. Once operational, the Leamhain Dam would be a prominent new feature within the landscape and along the lower part of the route towards Loch Pattack, a key attraction which would be diminished longer term.

7.175 VL8 – West of Loch a' Bhealaich Leamhain is representative of upland views of the upper reservoir from the stalkers path over Bealach Leamhain and the visual effects on Loch a’ Bhealaich Leamhain. The path is part of the wider route between Beinn a’ Chlachair and Creag Pitridh linking the nearby 3 Munros. The visualisation location is within both WLA 14: Rannoch-Nevis-Mamore-Alder and Ben Alder, Laggan and Glen Banchor SLA.

7.176 From the stalkers path there are elevated long-distance but focussed views to the south across Loch a’ Bhealach Leamhain, Loch Pattack and wider landscape including rugged mountains and in the distance, areas of coniferous forestry. Travelling north, views are more contained, especially around Loch a’ Bhealach Leamhain.

7.177 From this visualisation location there would be views of extensive construction activity within the upper reservoir area and at the Leamhain Dam at close proximity from the sections of route around Loch a' Bhealaich Leamhain. Views of construction works for

the Leamhain Dam would also be prominent when ascending the route from Loch Pattack. Parts of this route would also be widened and used for construction traffic.

7.178 After construction there would continue to be views of the Leamhain Dam, upper reservoir and associated drawdown, new tracks (reduced in width after construction period) along with access to the gate gallery. Parts of the route would be inundated but would be re-constructed at a higher level. From the lower part of the route towards Loch Pattack, the dam would be prominent but would screen other features around the reservoir from view. As with VL8, whilst the expanded loch would not appear out of keeping within the landform, and there is an element of containment with hills in background, the Leamhain Dam along with the visible drawdown area would increase the influence of manmade features within the view which would diminish the sense of naturalness and wildness.

7.179 The effects will be Significant from the construction period and throughout operational years 1 and 15.

7.180 R14 Mountain Route to Carn Dearg, GealCharn, Aonach Beag and Beinn Eibhinn noted above in relation to VL3 - Carn Dearg passes through the Pattack valley set back from shore of Loch Pattack. The effects of the proposed development along the route are covered previously. VL10 – Track to Loch Pattack is representative of the outlook from the track where views west open up across exposed moorland and the loch towards surrounding hills. The track is part of a wider route linking the Carn Dearg, GealCharn, Aonach Beag and Beinn Eibhinn Munros. The visualisation location is within the WLA 14 Rannoch-Nevis-Mamore-Alder.

7.181 From this visualisation location the construction phase will be particularly noticeable and distracting where visible. There will be various elements of activity viewed from the Pattack valley and shore of Loch Pattack for the construction of Leamhain Dam and associated access tracks.

7.182 Leamhain Dam would be a prominent feature located on higher ground drawing the eye of receptors around Loch Pattack. The proposed development would increase the influence of manmade features interrupting the flow of the undulating hillside within the view which would diminish the sense of naturalness and wildness from this view.

7.183 As noted with some other viewpoints, there is concern as to whether the visualisation provided is a realistic interpretation of how Leamhain Dam will appear from around Loch Pattack as the dam appears particularly faint in the images. The applicant noted that dappled lighting caused by the cloud cover might be one reason it was considered unrepresentative and reiterated that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance.

7.184 The effects will be Significant from the construction period and throughout operational years 1 and 15.

7.185 R6 Mountain Route to Beinn a’ Chlachair, Geal Charn and Creag Pitridh is a circular recreational route connecting the ascent and descent of the three Munros from the A86. Construction works and activity would be very noticeable from most of this route with short sections also used for construction access. Part of the route south of Shuas Dam would also be rerouted and some of the proposed tracks may also be adopted by

walkers as a more favourable route, such as the track to the surge shaft. During operation longer term, views of the proposed development would generally be intermittent and changing with little perceptibility from many elevated sections where more distant views more noticeably draw the eye. Mitigation measures help to reduce some of the visual effects. Therefore, whilst some of views may be changed it is not considered that the longer-term effect to the visual amenity of this route would be significantly adverse as expansive elevated upland and mountain views would still be experienced by receptors.

7.186 With regards to the lower reservoir VL4 – Creag Pitridh summit is a Munro between the upper and lower lochs of the development representative of views of the lower reservoir from this and other summits such as Beinn a' Chlachair, Geal Charn along the circular recreational route from the A86 connecting these three Munros. The visualisation location is within both WLA 14: Rannoch-Nevis-Mamore-Alder and Ben Alder, Laggan and Glen Banchor SLA. An additional visualisation has also been provided for VL4 showing the site compound SC5 and borrow pit BP3 between the 2 lochs at Lochan na h -Earba during the construction phase.

7.187 From this visualisation location there are expansive views across Loch Earba and Loch Laggan to the north and north west with views of the forested valley floor traversed by the River Spean to the west and south west.

7.188 Construction works and activity associated with the proposed development would be very noticeable from this summit. Additionally, there would be intervisibility with construction works at the northern part of the lower reservoir from Creag Pitridh. Such activities will interrupt the remote character and sense of wildness in the view where there is currently relatively limited human intervention.

7.189 The current view of the distinctive characteristic of the twin lochs will change with them merging into one loch with the addition of promontories projecting from either shoreline. During operation the Shios Dam, northern part of the lower reservoir along with new tracks and drawdown would be seen from this summit. Mitigation measures including reinstatement, particularly around access tracks and planting within the surrounding area will help to reduce visual effects to some extent. The applicant considers that that the longer term effect to the visual amenity of this summit would not be significantly adverse as expansive elevated upland and mountain views would still be experienced from the outlook of Creag Pitridh. They consider that the magnitude of change will reduce to Low-Medium and Low in year 1 and year 15 of operation with the effects not significant.

7.190 It is considered that the applicant has understated the visual impact at the early operational stage before mitigation measures along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change would remain High for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. This would taper off as the years passed to Low-Medium and Minor-Moderate Adverse (not significant) in year 15.

7.191 When queried if the drawdown area has been understated in the montage images the applicant acknowledged that the drawdown area appeared slightly less grey than some of the other montages used for other viewpoints. However, they consider the

visualisations are an accurate depiction of drawdown at the half way point as described in the methodology and note the steep gradient of the slopes around Loch Earba which results in limited horizontal drawdown.

7.192 R6 Mountain Route to Beinn a ' Chlachair, Geal Charn and Creag Pitridh noted above in relation to VL4 – Creag Pitridh ascends to this summit. The effects of the proposed development along the route are covered previously. VL5 - Beinn a' Chlachair summit is another Munro summit on part of the route connecting with VL4 – Creag Pitridh summit to the south of the development representative of views of the lower reservoir. The visualisation location is within both WLA 14: Rannoch-Nevis-Mamore-Alder and Ben Alder, Laggan and Glen Banchor SLA.

7.193 From this visualisation location there are expansive views across Lochan na h -Earba and Loch Laggan to the north and north west with views of the forested valley floor traversed by the River Spean to the west and south west.

7.194 Construction works and significant activity associated with the proposed development would be very noticeable from this summit. Additionally, there would be intervisibility with construction works at the the Shuas Dam, main site compounds SC2A and SC2B and southern lower reservoir would be seen from northern parts of the Beinn a' Chlachair summit. The Leamhain Dam and upper reservoir would also be seen briefly on the descent from this summit towards Bealach Leamhain. Such activities will interrupt the remote character and sense of wildness in the view where there is currently relatively limited human intervention.

7.195 During operation the Shuas Dam and southern lower reservoir along with new tracks and drawdown would be seen from this summit. Mitigation measures including reinstatement, particularly around access tracks and planting within the surrounding area will help to reduce visual effects to some extent. The applicant considers that the longer term effect to the visual amenity of this summit would not be significantly adverse as expansive elevated upland and mountain views would still be experienced from the outlook of Beinn a' Chlachair. They consider that the magnitude of change will reduce to Low-Medium and Low in year 1 and year 15 of operation with the effects not significant.

7.196 As with VL4 – Creag Pitridh summit, it is considered that the applicant has understated the visual impact at the early operational stage before mitigation measures along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change would remain High for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. This would taper off as the years passed to Low-Medium and Minor-Moderate Adverse (not significant) in year 15.

7.197 The initial photo image appears to have a slight haze but the applicant advised this was a result of light conditions on the day. Also, there is some concern that the outer face of the dam does not emulate the surrounding landform and appears jarring from this view. The applicant notes that the dam was considered in detail at the planning design stage with the slope proposed at a much more reduced angle than is typical for an embankment dam which allows for turfs to succeed on the structure and will merge into the hillside more subtly than shown on the visualisations. They note that the dam is subject to the Reservoirs (Scotland) Act 2011 and providing landscape features on

the dam face or large trees is not allowed.

7.198 In summary, Significant adverse visual effects of the development for recreational users of the outdoors are relatively well contained. This is by virtue of the surrounding topography and low lying nature of the proposal. Such Significant affects would be most acute during construction of the lower reservoir infrastructure, extending around the lower lying shoreline of Loch Earba and into surrounding upland locations up to between 3km to 4km, particularly when seen from the south and south east. Significant affects would be most acute during construction of the upper reservoir infrastructure, extending across upland paths and summits up to between 4km to 5km, particularly when seen from the south, south east and east. Once operational, there would be no long term permanent Significant adverse visual effects in and around the lower reservoir but Significant adverse visual effects would continue from upland paths and summits up to between 4km to 5km from the upper reservoir infrastructure, again when seen from the south, south east and east, once operational. However, these effects are found to be suitably mitigated by design and are acceptable for a project of this scale, owing to the wider environmental benefits of the scheme.

Impact on Road Users

7.199 The impact on road users has been assessed from the A86 for those travelling through Glen Spean along northern shores of Loch Laggan. Views from these routes would be experienced transiently by road users, mainly drivers and passengers along with cyclists. The view along the route is a variety of open and enclosed, generally low-level outlook. The northern part of the A86 passes along the edge of forestry which encloses views to the north. It then passes north and east of Meall Chaorach before heading south through Strath Ossian where views along the strath are channelled by surrounding hills.

7.200 Construction works around Shuas Dam and surrounding tracks would be seen in easterly views from approximately 2.5km of the route along the lower slopes of Meall Chaorach. These views would be low level and relatively distant. During operation, these features would likely be scarcely perceptible when considering allowing for the vegetated front face of the Shuas Dam over time along further planting.

7.201 The applicant considers the sensitivity of the route as Medium, the magnitude of change as Low during construction then reducing to Negligible once operational. The effect on road users along the A86 is considered to be Minor Adverse (Not Significant) during construction decreasing to Negligible once operational. This is agreed.

Impact on Residential Receptors

7.202 Building-based receptors within the study area are limited to scattered buildings along the A86 (Figure 7.6). The main settlement within the study area is Kinloch Laggan, located approximately 5km from the proposed development. Four receptor groups have been identified for inclusion within the visual assessment: Luiblea and Tòrgulbin, Moy Lodge, Moy and Kinloch Laggan (B1, B2, B3 and B4 on Figure 7.7).

7.203 Luiblea and Tòrgulbin are residential properties in a grouping south of the A86 and River Spean, west of Loch Laggan, on either side of Abhainn Ghuilbinn. Moy Lodge is located on the A86 at the western end of Loch Laggan. Moy is on the southern side of

the A86. Kinloch Laggan comprises a group of buildings at the north eastern end of Loch Laggan including the properties Tullochroam, Aberarder Lodge, Kinloch Lodge amongst others, as well as the St Kenneth's Cross, beach and Corporal J Hendry GC Memorial.

7.204 From Luiblea and Tòrgulbin some construction activity would be partially visible nearby, in some side-on and oblique main views, including a compound and borrow pit. Construction works would be screened by trees and an earth bund formed during the building phase, whilst other work such as the construction of a track would be seen on elevated ground. The effect is considered to be Moderate Adverse (Not Significant).

7.205 From Moy and Kinloch Laggan the Shios Dam construction works at may be perceptible in some views in the distance but would be unlikely to be detracting. The effect is considered to be Minor Adverse (Not Significant).

7.206 From Moy Lodge construction works would be hidden from view by trees and landform. The effect is considered to be Negligible (Not Significant).

7.207 During operation any views of the proposed development would be of limited perceptibility with minimal change to the view. The effect is considered to be Negligible (Not Significant).

7.208 There would be no significant effects to the visual amenity of residents or other building-based visual receptors within the study area. This is agreed.

Cumulative Landscape and Visual Impact

7.209 In addition to the above, it is important to consider the context of the development in combination with other renewable energy developments and assess the likely cumulative effects. Of particular importance is how renewable energy developments relate to each other in design and relationship to their surroundings, their frequency when moving through the landscape and their visual separation to allow experience of the character of the landscape in between.

7.210 Two developments were identified for inclusion within the cumulative assessment. The proposed Corrievarkie Pumped Storage Scheme at the southern end of Loch Ericht. This is currently at Scoping stage (21/03366/SCOP) and is therefore assessed as a theoretical development with no fixed design. The other is the replacement weir and change to inundation levels on Loch Ossian consented in November 2022 (21/03981/FUL).

7.211 The cumulative assessment has considered effect during operation only as it is difficult to predict when construction works would take place and what these would involve.

7.212 The proposed Corrievarkie Pumped Storage Scheme would be located in the far south of the study area and partially outside it. There is some potential that there would be areas of shared intervisibility from lower lying areas, however, this would be relatively limited. Some of the higher hills around the southern of the study area, including Càrn Dearg (where Significant effects are noted). Whilst there is the potential that a new dam and/or a powerhouse may be visible for the proposed Corrievarkie development, this would be some distance away and likely to be less prominent than the Leamhain

Dam. It would also be seen to be in a different landscape type where forestry and scattered distant buildings are present in the view. Due to the locations of the two developments on either side of Carn Dearg the area of potential shared intervisibility would likely be extremely limited, covering only the summit and ridgeline area.

7.213 The most likely location for visual receptors to obtain views of both developments would be along the mountain track to Carn Dearg, Geal-Charn, Aonach Beag and Beinn Eibhinn (Route R14) along the ridgeline and summit area of Càrn Dearg. There could also be some potential for sequential views from the Kinloch Laggan to Corrour via Loch Pattack track (Route R15) where the two developments could be seen from different parts of the route. Whilst the proposed Corrievarkie development would be some distance away from Càrn Dearg in comparison with the proposed development it is considered that it would likely to be noticeable in the view. However, it would be seen in the context of forest plantation and existing buildings on the shore of Loch Ericht. The proposed development would add a new feature to the northerly view in the opposite direction to the proposed Corrievarkie development, requiring receptors to turn in all directions to appreciate both developments. Whilst the proposed development would be in close proximity to this route and very noticeable leading to a Significant effect on receptors from VL3 - Carn Dearg summit, the assumed presence of the proposed Corrievarkie development is not anticipated to lead to a change to the baseline that would result in any greater effect.

7.214 The Loch Ossain Weir is outwith the study area. It would be a low lying feature within the landscape replacing an existing weir and set within existing buildings of Corrour Estate. The drawdown area on Loch Ossian would be relatively contained visually by surrounding forest/woodland and hills with the landscape effects associated with this development very localised. Whilst there is potential for sequential visibility along Fersit to Loch Ossian route (Route R13) the consented Loch Ossian Weir would be seen within the context of other development at Corrour Lodge. This is considered unlikely to noticeably change the visual baseline along this route. Potential views of the two developments would be seen from very disparate parts of the route and would be unlikely to be considered in relation to each other.

7.215 Neither of the cumulative baseline developments would be visible from any building locations where the proposed development would be seen.

7.216 The cumulative assessment has identified small portions within the study area where the landscape and visual effects of the proposed development would be marginally increased if other proposed developments were considered within the baseline. As such, cumulative effects are not significant. This is agreed.

Construction

7.217 The applicant has outlined the construction programme for the proposed development over a seven year period with four and a half years focussed on building the various elements of the pumped storage hydro scheme. Year one will involve ground investigation works. Year two will see works start on the access tracks and work areas, habitat compensation and enhancement, on the lower reservoir, upper reservoir, tunnels and powerhouse. Turbine and electrical installation works will start late in year three. Reservoir filling will take place in the second half of year four with

commissioning predicted in the second half of year six.

7.218 The national scale development will have temporary construction impacts including, for example, traffic, noise, and dust. Additionally, there will be significant associated development including construction compounds, laydown areas (for material, spoil, equipment, plant and construction vehicles) welfare facilities, mobile concrete batching plant as well as storage for fuel, oils and other equipment. It is for these reasons that the applicant has a commitment toward a project specific Construction and Environmental Management Document (CEMD) approach, the finalised details of which, following appointment of the project contractor, would require approval from the Planning Authority in consultation with relevant consultees. In addition, the applicant has also committed to the appointment of an Ecological Clerk of Works (ECoW) to oversee the project. This can dovetail with a Planning Monitoring Officer role to monitor compliance with the conditions attached to any consent.

7.219 A mass balance (spoil management) strategy and borrow pit plan (Appendix 2.4 Mass Balance Strategy and Borrow Pit Plan) estimates that 4.5 million tonnes of spoil will be generated by the proposed development. The strategy has been designed to maximise the use of materials generated from within the site for construction of the permanent works with any surplus materials generated put to beneficial use within the site. This approach would minimise the environmental impact by avoiding the need to transport bulk materials to the site wherever possible and by minimising the generation of any waste material that would need to be taken off site for disposal.

7.220 Aggregates won from the site will be used for the construction of access tracks and manufacture of concrete (cement would need to be imported). Rock and earth fill materials will be used for the construction of the dams. Earth and peat materials will be used for the reinstatement measures including the construction of the promontories on the shores of the lower reservoir to recreate the landscape impression given by the existing separation between the two Earba Lochs currently.

7.221 SEPA note that for them not to consider the use of the spoil material as a waste activity there needs to be a genuine planning need which has been confirmed. SEPA note that the strategy and plan are based on preliminary ground investigations which may require to be updated following further works. SEPA have requested they be consulted on any additional proposals to make use of excavated material on site and ask that this is controlled by condition. The submission should include information on the volume of material to be used, the manner it is to be used and a justification for the need for the works. For the avoidance of doubt there should be no long-term storage of material on site and material should only be temporarily stored within the identified construction areas. Additionally, SEPA note that borrow pits associated with the Shuas and Shios Dams in the lower reservoir will be within inundation areas, therefore, the pits should be worked and restored in line with the strategy and plan which will also be controlled by condition.

7.222 Aggregates would be sourced from the powerhouse excavation and from the excavation of the underground waterway systems along with a number of borrow pits throughout the site. Rock materials would be sourced from excavation of the powerhouse and the underground waterway system along with borrow pits. Earth fill materials would be sourced from the powerhouse excavation and from removal of in

situ material from the footprints of the dams.

7.223 Normal construction shifts would generally apply for the surface works, such as the access tracks, dams, powerhouse, upper control works and lower control works, but the applicant notes that these could be subject to some variation to suit the ongoing work, weather conditions and time of year. Underground operations are anticipated to continue 24 hours a day, seven days a week.

7.224 There are likely to be some adverse impacts caused by construction traffic and disruption given the length of the build period for the proposed development. The recommended hours for activities which are audible at any noise sensitive receptor are between 8am and 6pm Monday to Saturday (with a requirement for a reduced 45dB LAeq 1 hour between 1pm to 6pm on Saturday as opposed to 55dB LAeq 1 hour for the rest of the week) with no works on Sunday. However, it is understood that for a development of this size, there is some merit in allowing some work to be carried on outwith normal working hours if it is likely to significantly reduce the overall length of the construction period and the impact on surrounding residents can be kept to a minimum.

7.225 Applicants must comply with reasonable operational practices with regard to construction noise so as not to cause nuisance. Section 60 of the Control of Pollution Act 1974 sets restrictions in terms of hours of operation, plant and equipment used and noise levels etc. and is enforceable via Environmental Health and not Planning. A condition is requested to secure details of how contractors would employ the best practicable means to reduce the impact of noise from construction activities.

7.226 The nature of the project anticipates the need for a Construction Environmental Management Plan (CEMP). An outline CEMP has been provided (EIAR Volume 4 Appendix 2.3), the detailed CEMP is controlled by condition. It should include site specific environmental management procedures which can be finalised and agreed through appropriate planning conditions. Due to the scale of the development SEPA would control pollution prevention measures relating to surface water run-off via a Controlled Activities Regulations (CAR) Construction Site Licence along with the hydropower element of the proposed development.

7.227 In addition to the requirement for submission and agreement on a CEMP the Council will require the applicant to provide a financial bond regarding final site restoration (restoration bond) in the event of non-operation and to provide a Construction Traffic Management Plan (CTMP) for the use of the trunk road network.

7.228 A Community Liaison Group (CLG) will be conditioned to ensure that the Community Council and other stakeholders are kept up to date and consulted before and during the construction period.

7.229 Light pollution significantly affects the rural countryside, from disturbing the way animals and plants perceive daytime and night time to making developments visible across wide areas. For safety reasons, temporary lighting would be required for all external construction activities during hours of darkness and low natural light. This lighting would be designed to minimise illumination, glare or light spillage to nearby receptors. Once operational, external lighting would only be provided at key areas such as the lower control works but only required during essential operational and

maintenance activities, for example if a switching operation was necessary in the external switchyard. Full details of the specification of lighting are to be provided and are controlled by condition.

Construction Infrastructure

7.230 A number of site compounds (SC) and borrowpits (BP) would be required across the site to accommodate the site establishment, lay down areas and extraction of materials for construction works (outlined on Figure 2.3 Scheme Layout Aerial). The locations generally correlate to the different construction areas across the site. The applicant has provided an additional visualisation from VL4 – Creag Pitridh summit to show as an example of the site compound and borrowpit during the construction phase when viewed from the surrounding area.

7.231 SC1 and BP1 adjacent to the site entrance from the A86 (Figure 2.2.1) measures approximately 3ha and would contain offices, parking and holding areas for all vehicles accessing the site to avoid vehicles stopping on the trunk road laybys. The compound would be continuously manned to manage vehicles arriving at the site and would ensure wheel washing facilities are used prior to construction traffic leaving site and returning on to the A86. Some laydown areas would also be provided for material deliveries to the site. SC1 would be formed by extracting stone over part of its area to a depth of between 3m to 4m with spoil used to form a 3m high noise barrier and bund along the west edge of the track and laydown areas. The bund would mitigate the impact of noise of traffic movements on surrounding properties.

7.232 SC2B adjacent to the Shuas Dam (Figure 2.31) measures approximately 300m by 150m and would include parking, laydown areas for plant and equipment, water, sanitary and electrical services along with provision for a small concrete batching plant for the later phases of the project. The compound would also contain a bunded holding area for any deep catotelm peat or amorphous peat which may be extracted from the Shuas Dam foundations.

7.233 In addition, a worker residential camp (SC2A) set back from the Shuas Dam will be constructed (Figure 2.31 Site Compound SC2 Shuas Dam – Plan and Sections). The approximately 300m by 120m camp would contain offices and “bunakbin” accommodation units which would be stacked in two or three storey levels to minimise the footprint on the ground along with amenities for workers. These include a football pitch, outside amenity area, two storey canteen, drying room and internal recreational area.

7.234 Given the substantial workforce on site, the camp will effectively operate as a new settlement within a relatively remote rural setting. This has caused concerns and referenced in a number of representations received. Comments considered the level of detail regarding how the worker camp will be built, heated, lit, serviced along with sanitary/water arrangements etc. is insufficient. The applicant has provided a plan and sections (Figure 2.31) and the worker camp, along with the other site compounds referenced, will be controlled by condition. They confirmed that facilities for power generation, water supply and waste treatment will be provided. Given the large workforce located on site for a number of years it was considered that this would bring additional noise, traffic, environmental damage and light that will have an impact on residents in the surrounding area. Given the sizeable set back from residential

properties and the landform it is considered that the location will provide mitigation to minimise potential detrimental impacts to neighbour amenity. No concerns were raised regarding potential long lasting impacts to habitat or ecology, given the temporary nature of the camp and other site compounds it is expected that the site will recover to its previous condition following reinstatement and planting which is controlled by condition. In terms of traffic, whilst there will be vehicles coming and going from the site, workers staying in accommodation on site will help to significantly reduce vehicle movements.

7.235 SC3 adjacent to the powerhouse and lower control works (Figure 2.32) measures approximately 600m by 150m be formed by two or three terraced level areas running above the existing Locha na h-Earba shoreline. This compound would contain a bulk earthworks / materials handling area and a concrete batching plant for the main civil works stages of the project along with an additional temporary laydown for plant and materials.

7.236 SC5 and BP3 in the central portion of the lower reservoir adjacent to the promontories (Figure 2.2.2) would measure approximately 250m by 100m would be located adjacent to borrow pit BP3, between the existing Locha na h Earba lochs but within the proposed upper inundation zone of the lower reservoir. This compound would be used for earthworks material processing for the Shios Dam, Shuas Dam and powerhouse.

7.237 SC6A, SC6B and BP4, adjacent to Shios Dam (Figure 2.2.3) would measure approximately two 50m by 50m consisting of satellite compounds located in clearings between the existing trees at Shios Dam for its construction.

7.238 SC7 adjacent to the surge shafts (Figure 2.35) The small site compound SC7 measures approximately 100m by 50m and would serve the shaft works for the three surge shafts west of Creag Pitridh.

7.239 SC8, BP5A and BP5B adjacent to the upper control works and upper reservoir (Figure 2.36 and Figure 2.37) would be used for offices and site establishment local to the Leamhain Dam works as well as stockpiling and processing of rock fill for the dam during its construction. Material would be processed from the borrowpits and the intake excavations for use in the Leamhain dam. The compound would also be used for drainage management and settling ponds for cleaning rainwater run-off from the reservoir construction area before discharging to the lower loch and Leamhain burn. This compound would only be formed after the appropriate drainage and construction environmental measures had been installed at the lochan and the lochan would then be drawn down. Thereafter, a raised platform would be formed using sands and gravels taken from the overburden and the dam foundation.

7.240 The applicant notes there is potential to locate temporary solar arrays within the footprints of the site compounds which would enhance the sustainable use of electric vehicles and plant. Electrical power supply and charging from several of the local hydroelectric schemes in the wider surrounding would is being explored by the applicant as a viable sustainable temporary power supply. Vehicles used in the operation of the proposed development are proposed to be electric vehicles (EVs) wherever practicable. The powerhouse will provide sufficient charging points for all vehicles used to operate the scheme, as well as for staff vehicles to recharge whilst at

work.

Noise and Vibration

7.241 EIAR Volume 1 Chapter 18 Noise and Vibration sets out the assessment of the potential noise and vibration impacts along with the likely effects on environmental receptors associated with the proposed development.

7.242 Due to the separation distances, topography between the development and receptors and given the majority of plant machinery and other noise sources will be underground, Highland Council's Environmental Health Team previously agreed that a detailed operational noise assessment could be scoped out. However, the applicant has submitted information on the impact of operational activities and has carried out a background noise survey. The control of operational noise is integral to the design of the proposed development as all the main generation equipment (such as the reversible pump-turbine, generators and associated equipment) would be located underground within the enclosed powerhouse. Additionally, the surrounding rock will reduce noise breakout from tunnels to the surface. Whilst operational noise is not expected to be audible at noise sensitive locations, as a precaution, a condition covering noise levels arising from the proposed development is recommended.

7.243 The creation of a temporary haul road to connect the lower reservoir works area to the upper reservoir and dam provides further noise mitigation with the opportunity to supplement rock quarried within the upper reservoir, with suitable tunnel spoil from the underground works, for dam construction, thus reducing off-site disposal quantities and noise impacts resulting from associated vehicle movements.

7.244 A number of representations raised concerns regarding noise associated with building works. Given the relatively rural location set back some distance from the closest noise sensitive receptors construction noise at the site itself is unlikely to be a significant issue. However, the development will include either new or upgraded access tracks closer to noise sensitive receptors, particularly the houses at Luiblea and Torgulbin. The Environmental Health Team noted the worst predicted levels are 67dB(A) during road access works along with elevated noise levels at other phases of construction. As works on the access progress away from the houses, noise will reduce, however, there will be noise from traffic for the duration of the construction period. The applicant has submitted a Draft Construction Noise and Vibration Management Plan (CNVMP) which confirms that the best practicable means will be employed to minimise the impact of construction noise and specifically refers to various proposed mitigation measures such as the installation of noise bunds or barriers to minimise the worst noise at Luiblea and Torgulbin. These should be in place prior to the access track works commencing which can be conditioned.

7.245 The Environmental Health Team noted the following noise limitations be applied to the proposed development:

Noise

- Monday to Friday - 8am to 6pm 55dB LAeq 1 hour;
- Saturdays - 8am to 1pm 55dB LAeq 1hour; Saturdays - 1pm to 6pm 45dB LAeq 1 hour;

- Outwith the above times, noise from construction related activities shall not exceed 35dB LAeq 1 hour.

Groundborne Noise

- Monday to Friday - 8am to 6pm 35dB LASmax;
- Saturdays - 8am to 6pm 35dB LASmax;
- Outwith the above times, groundborne noise from construction related activities shall not exceed 30dB LASmax.

7.246 The Environmental Health Team noted the following vibration limitations be applied to the proposed development:

- Monday to Friday - 8am to 6pm, the peak particle velocity shall not exceed 5 mm·s−1;
- Saturdays - 8am to 1pm, the peak particle velocity shall not exceed 5 mm·s−1;
- Outwith the above times, the peak particle velocity shall not exceed 0.3 mm·s-1;
- The above limits apply to all construction activities other than blasting. For blasting, the applicant will be required to submit a scheme demonstrating that the best practicable means will be employed to minimise the impact of noise and vibration.

7.247 Construction noise and vibration would be managed through the finalised CNVMP which would be formally agreed with the Planning Authority prior to construction work commencing and is controlled by condition.

7.248 A number of representations raise concerns regarding the impact of noise associated with the proposed development. Whilst there will be noise during construction given the separation distance from noise sensitive receptors it is generally considered the proposed mitigation measures are appropriate.

7.249 Community Councils raised concerns regarding their experience of Coire Glas pumped hydro storage scheme following amendments to conditions controlling construction working hours which allowed for an extension of time. For a development of this national scale there is some merit in allowing some work to be carried on outwith normal working hours if it is likely to significantly reduce the overall length of the construction period and the impact on residents can be kept to a minimum.

7.250 Additionally, a condition would require a Community Liaison Group be set up. Given the size and duration of the proposed development there may be disturbance over a prolonged period, not only noise but other issues such as increased traffic and accesses used for recreation, as such, the Community Liaison Group will help to ensure that the Community Council and other stakeholders are kept up to date and consulted before, during and after the construction period.

7.251 The applicant has adopted the best practical means and mitigation measures to control noise and vibration for the proposed development which would be managed through CNVMP and controlled by condition. It is agreed with the findings in EIAR Volume 1 Chapter 18 Noise and Vibration that the effects are not significant.

Roads, Transport and Access

7.252 The EIAR assessed the impact of the development on roads, transport and access including movement of Abnormally Indivisible Loads (AIL) along with cumulative effects. During the construction phase there will fluctuations in traffic travelling to and from the site, with the predicted peak of construction traffic movement having been assessed to determine the worst-case effects on roads within the study area. EIAR Volume 1 Chapter 17 Transport and Access is supported by a Transport Assessment prepared by Pell Frischmann (Appendix 17.1). Chapter 17 notes that the assessment has been carried out in accordance with the updated guidance presented in the Institute of Environmental Management and Assessment (IEMA) document, Environmental Assessment of Traffic and Movement (July 2023). This is considered appropriate.

7.253 Construction period traffic comprises: staff transport in either cars or staff minibuses to the workers camp; Light Goods Vehicles (LGV) providing supplies, provisions and deliveries to the construction offices and workers camp; fuel and oil deliveries made in Heavy Goods Vehicles (HGV); construction equipment, plant and machinery by HGV, low loader or similar; bulk materials such as cement and aggregate (the majority of aggregates will be won from the site); and abnormal Indivisible Loads (AIL) associated with the larger scale machinery including transformer, electrical/mechanical equipment and tunnel linings.

7.254 Once operational, the applicant considers the traffic effects of the proposed development are likely to be insignificant as expected traffic flows will be typically up to fifteen vehicle movements per day, far below the recognised thresholds for triggering a formal transport assessment. As such, the effects during the operation phase are scoped out of the assessment. This approach is agreed.

7.255 The proposed development will be accessed from the A86 trunk road, located at the north western boundary of the site, at the southern end of Loch Laggan. Here a new site access junction will be formed slightly further north east from an existing access and bridge crossing the River Spean. This single point of vehicle access would serve the entirety of the construction and operation of the facility. The Transport Assessment shows the updated access where visibility splays of 4.5m by 215m can be achieved. Whilst Transport Scotland are supportive of the details submitted in principle, their technical approval process will be required for the access junction along with a road safety audit to support the proposed works.

7.256 The study area includes the following trunk roads: A86, A889, A9 and A82. The effects of the proposed development will be most notable on the A889 and the A86 east of the site where these roads link with the A9. The A86 is a two-way single carriageway which forms part of the trunk road network and provides a connection between the A9 at Kingussie and the A82 at Spean Bridge. The A86 is maintained by BEAR Scotland and is generally subject to the national speed limit which also reduces when travelling through towns and villages along the route. The A889 is a two-way single carriageway which forms part of the trunk road network and provides a connection between the A9 at Dalwhinnie and the junction with the A86 near Laggan. The A889 is maintained by BEAR Scotland and is generally subject to the national speed limit which reduces

when travelling through Dalwhinnie.

7.257 Main construction works are expected to commence in 2026 and are anticipated to take 64 months, therefore, National Road Traffic Forecast NRTF low growth for 2023 to 2029 has been applied. This is a factor used to adjust traffic flows from one year to another. The resulting 24 Hour Average Daily traffic flows for 2029 are presented in Table 17.5. Chapter 17 notes that users of the A86 and A889 along with residents of Newtonmore, Kingussie and Spean Bridge are identified as “sensitive receptors”, therefore, these locations are subject to “Rule 2” of the IEMA Guidelines which requires a full assessment of effects if the locations are subject to an increase of 10% or more in traffic. Transport Scotland consider this approach is acceptable.

7.258 The construction trip generation and distribution has been established and is presented within the Transport Assessment (Appendix 17.1). This indicates that the peak month for construction traffic is Month 39 when there will be a total of 536 movements (268 inbound and 268 outbound) per day. Of the total 536 movements, 490 will be car/LGVs and 46 will be HGVs. The peak traffic has been added to the future year baseline traffic flows (2029) to establish the percentage impact that these flows will have (shown in Table 17.7 2029 Future Baseline + Construction Peak Traffic Summary). This demonstrates that the most onerous impact occurs at the site entrance, with a total traffic increase of 39% or a 62.5% increase in HGVs. The sensitive traffic receptors of Spean Bridge, Dalwhinnie and Newtonmore/Kingussie would experience a 3.1%, 10.3% and 20.3% increase the total number of vehicle trips respectively.

7.259 Transport Scotland considers that this indicates further assessment is required on the A86 and A889 as well as at Dalwhinnie and Newtonmore/Kingussie. The significance of the potential effects has been determined using the rules and thresholds as presented within the IEMA Guidelines (shown in Table 17.8). It is considered users of the A86, A889 and residents of Newtonmore/Kingussie would experience Moderate and Significant effects prior to the application of mitigation measures. Whilst the effects relate to the peak month of construction and are transitory in nature, a Construction Traffic Management Plan (CTMP) will be implemented in order to mitigate these impacts to a level where residual effects would be slight or negligible and not significant. The CTMP will require to be discussed and agreed with Transport Scotland in consultation with the Planning Authority with this to be controlled by condition.

7.260 An Abnormal Indivisible Load Route Survey (AILRS) has been carried and is included within the Transport Assessment (Appendix 17.1). This indicates that two Ports of Entry (POE) are proposed, with transformer loads being transported from Corpach Harbour and the tunnel lining being transported from either the Port of Inverness or from a manufacturing facility located in the central belt. Transport Scotland note that this would be confirmed after the planning determination allowing for the confirmation of all points of origin and all external dimensions clarified. Full details of the AIL route can be controlled by condition. An assessment of the route from Corpach Harbour has been carried out, as well as a route for the lining sections from the junction of the A9 and A889 (shown in Figure 3.1 and Figure 3.2 of the Transport Assessment along with the Constraint Points and Details presented in Table 3-1). Numerous constraint points are identified along the trunk road routes, where trunk road street furniture will require to be removed (and replaced), load bearing surfaces will be required and trees/vegetation will require to be trimmed/removed. The ALRS will require to be

discussed and agreed with the Transport Scotland in consultation with the Planning Authority for the routes affected by the proposed development.

7.261 Transport Scotland has confirmed that the development traffic can be accommodated on the trunk road network, subject to conditions as well as the requirement for a legal agreement to address “wear and tear” provisions. These would be consistent with current best practice and need to highlight potential cumulative impacts arising with other major and national developments within the wider surrounding area. They request conditions to secure the following:

- Approval of the proposed means of access to the trunk road;
- Approval of a proposed route for any abnormal loads on the trunk road network;
- Approval of all accommodation measures required on the trunk road network, including the removal of street furniture, junction widening, and traffic management prior to movement by abnormal load;
- Approval of additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being transported prior to the movement of any components and/or construction materials;
- A Construction Traffic Management Plan to include a range of measures including protocols and a programme for abnormal loads;
- Details of vehicle wheel cleansing facilities within the site.

7.262 The EIAR assessed the cumulative impact of consented developments in the study area which include Coire Glas pumped hydro storage Scheme, Cloiche and Dell Wind Farms. Whilst the projects factored into the applicant’s cumulative assessment will be an incomplete picture, owing to the number of renewable energy proposals in the region at various stages of the consenting process, the principal nearby consents have been captured with the determination of future projects having to factor in Loch Earba into their cumulative assessment if consented. The applicant noted that the construction of these projects may coincide with construction activities associated with the proposed development, as such, the construction peak traffic flows have been obtained from the respective planning application documents for each application (summarised in Table 17.9 2029 Future Baseline + Construction + Cumulative Traffic Summary). The applicant considers the overall effects will be similar to that reported in in the Receptor Sensitivity Summary (Table 17.6) with significant effects existing prior to mitigation for users of the A86 and A889 along with residents of Newtonmore/Kingussie.

7.263 In terms of mitigation measures proposed to reduce traffic volumes during the construction phase, the establishment of a workers within the site will help significantly reduce the number of trips on the road network. Along with the CTMP various abnormal load mitigation works will be achieved through an Abnormal Load Transport Management Plan, Construction Staff Travel Plan, appropriate distribution of public information along with any cumulative measures if required.

7.264 Transport Scotland may require an agreement to cover the cost of abnormal wear and tear on the A86 in close proximity to the access junction. The applicant notes that video footage of the pre-construction phase condition of the construction vehicles route would be recorded to provide a baseline of the state of the road prior to any

construction work commencing. This baseline would inform any change in the road condition during the construction stage of the proposed development. Any necessary repairs would be coordinated with the Transport Scotland. The applicant notes any damage caused by traffic associated with the proposed development, during the construction period that would be hazardous to public traffic, would be repaired immediately. Any damage to road infrastructure caused directly by construction traffic would be made good and street furniture that is removed on a temporary basis would be fully reinstated. There would be a regular road edge review and any debris and mud would be removed from the public carriageway to keep the road clean and safe during the initial months of construction activity until the construction junction and immediate access track works are complete.

7.265 If the project were to be decommissioned, it is anticipated that the potential effects on transport and access would be equal to or lesser than the construction impacts noted.

7.266 Beyond the Trunk Road, the proposed development access into the site would be via private tracks on the Adverikie Estate. As no local public roads will be impacted by the proposed development Highland Council's Transport Planning Team raise no objection.

7.267 Community Councils along with representations from the general public considered the A889 and A86 are substandard and not suitable for the significant levels of construction traffic associated with the proposed development, with further road upgrades being sought. This has not however been borne out of the assessments undertaken forming part of the EIAR or Transport Scotland's consultation response. The applicant conceded the proposed development will increase traffic flows on the A86 which is narrow in sections during the construction period. They therefore propose to offer Transport Scotland financial support to introduce improved measures along the route such as enhanced signage, clearance of vegetation, improve forward visibility and enhanced laybys/passing places. The financial contribution would allow Transport Scotland to undertake any planned works early with the applicant hoping this goodwill gesture will assist in improving the road network for the benefit of all road users prior to works commencing on the proposed development and will allow Transport Scotland to bring forward its own considered works along the A86. The mechanism for securing this has not been confirmed, however, it is recommended this is secured by way of legal agreement, the detail of which required to be explored further between the parties and Scottish Ministers.

7.268 Community Councils and other representations received considered the proposed development would have a detrimental impact on road safety and consider mitigation measures proposed inadequate. Based on the information available the applicant considers that it has been established that there are no specific road safety issues within the surrounding area that require to be addressed or would be exacerbated by the development. Transport Scotland do not dispute this.

7.269 The proposed development would lead to an increase in traffic volumes within the study area during the construction phase, with the greatest impact along the A86 and A889. Whilst for a temporary period, these effects would continue over a number of years given the national scale of the proposed development. Outwith the peak period of construction, traffic volumes would fall considerably. The applicant has adopted the best practical means and mitigation measures to control roads, transport and access

related issues associated with the proposed development through the implementation of appropriate mitigation measures and subject to the conditions attached from Transport Scotland. It is agreed with the findings in EIAR Volume 1 Chapter 17 Transport and Access and the mitigation proposed, residual traffic and transport effects are not significant.

Wider Recreational Access

7.270 With regards to public access, EIAR Volume 1 Chapter 15 Recreation and Access considers the potential direct effects, including cumulative effects, of the proposed development on public recreation and access during construction and operation. Such effects generally include disruption to the use of recreational facilities/sites. The proposed development may also result in changes to the perceived amenity value of recreational facilities and sites, however, these generally relate to visual and noise effects assessed elsewhere within the EIAR.

7.271 A number of tracks within the site will be rerouted, upgraded and/or widened prior to the construction of the other elements of the proposed development. Various recreational routes, a mixture of accesses and footpaths, intersect the site (see Figure 15.2 Site Plan Showing Existing Access Routes and Footpaths During Construction). A number of the principal walking/running routes would be affected by construction activity. The existing estate tracks have interchangeable uses for both walkers and estate vehicles and some of the access tracks currently comprising parts of walking/running routes would be used for construction traffic. In other cases, new construction access tracks would be built separate from the existing recreational access routes. The proposals for maintaining access for walking and running are outlined (Appendix 15.1 - Draft Access Management Plan) which would maintain access within the site, except for areas which are the locations for construction of the infrastructure for the proposed development.

7.272 For the construction phase, the new access for the proposed development from the A86 will follow a new route to the north/north east of the existing estate track from the A86 extending to a width of 8m to accommodate HGV, AIL and other vehicles from the trunk road to the workers camp and compound area at Shuas Dam (SC2A and SC2B) and beyond to the powerhouse along the south eastern shore of Loch Earba. This will be reduced to 6m width post construction. As the track continues towards the powerhouse it reduces for a period to 5m width before increasing to 10m in an area directly in front of the powerhouse before reducing to 5m width for a portion then back to 6m along the length of the southern shore to the Shios Dam and for a short across the space between lochans.

7.273 A new access track linking the powerhouse to the Leamhain Dam extends through the higher ground, crossing back and forth between the Leamhain Dam gate houses with a spur leading on to the surge shafts. An existing estate track follows the route between the lower ground to Leamhain Dam to the south. The new access track continues around Loch Leamhain and beyond the eastern boundary. The width will be 6m for the full extent from the powerhouse up to and around Leamhain Dam.

7.274 A new 1m width path will follow along the northern shoreline of Loch Earba with short sections increased to 3m. A new 1m width path set back from Shuas Dam will link the existing estate track from the A86 to the estate track access to upland ground and

Leamhain Dam. Additionally, a new 1m width path will loop around the southern shore of Loch Leamhain and continue around the proposed Dam face and back along the northern shore.

7.275 For the operational phase, the routes noted will all be reduced in width with the 8m track from the A86 reducing to 6m and the upland track linking the upper reservoir and around the shoreline from 6m width to 4m. The length along the southern shore of Loch Earba will retain a small section of 6m width but the rest of the length will be reduced to 4m and the northern shoreline of Loch Earba will retain a short section of 3m width before extending to 1m along the full length of the loch. Representations have raised concerns with the landscape and visual effects of proposed construction tracks. Such effects are not disputed but have been mitigated as practicable. The post construction phasing of track access narrowing can be controlled by the RAMP condition to ensure all remaining tracks are of an appropriate scale to serve the operational needs of the development as well as the recreational access and wider estate land management requirements.

7.276 The proposed development will create approximately 27km of new tracks and 6km of upgraded tracks along with approximately 5.9km of new paths and 1km of upgraded paths.

7.277 In terms of lower level routes around the lower reservoir, access along the south shore of the Earba Lochs would be discouraged during construction as this area would be affected by a high level of construction activity and traffic, however, it would still be possible. The new track along the entire length of the north shore of the Earba Lochs, built in advance of the main construction work, would create an alternative route for access between the two ends of the lochs that would not be used by construction traffic.

7.278 In terms of hill tracks and long distance routes, there would be no direct impact on the Scottish Hill Tracks, 153, 154 and 155 which pass to the east of the proposed development. The East Highland Way would overlap with the site for limited stretches where the proposed development takes access from the A86 and again at the north east end of the site by the Shios Dam. Access would be maintained as outlined in the Draft Access Management Plan (Appendix 15.1). The applicant's assessment concludes that the effect on these walking routes would be Minor during construction which is agreed.

7.279 Access to the Munros: Beinn a Chlachair, Geal Charn and Creag Pitridh, and the Grahams: Binnein Shuas and Binnein Shios would be affected as detailed above. The existing estate track would be diverted close to Loch Ardruighe across the moorland to connect to the existing stalkers' path up Coire Pitridh. This path would be kept separate from the construction access track up this Coire as far as practicable. It is again agreed that the effect on walking would be Minor (not significant) during construction as per the applicant's assessment.

7.280 As well as walkers, effects on those using the outdoors for running, mountaineering, rock climbing, cycling, backpacking, swimming, canoeing, angling, horse riding, caving would all experience Minor (not significant) effects during construction which will continue into the operational phase of the proposed development. The track works will also lead to areas of betterment, for example, along the north side of Loch Earba, the

upgraded connecting footpath to the base of the cliffs and Adverikie Wall will allow for quicker and less boggy access to this rock-climbing venue, particularly if using a bike.

7.281 Construction and operational disturbance would be managed by provision of the measures outlined in the draft Access Management Plan prepared in consultation with the Highland Council's Access Officer. The draft Access Management Plan demonstrates a commitment to maintain and, where possible, improve access through the site during the construction and operation of the proposed development. It notes that site tracks and paths will be provided to maintain public access routes during construction and operation of the proposed development, provide safe public access at all stages of development and enhance public outdoor access in the long-term. The most significant impacts on recreation and access during both construction and operation have been assessed as Minor, and as such are not considered to be significant. This is agreed.

7.282 In terms of wider public access, there are no core paths within the site boundary or the wider Ardverikie Estate. There are however a number of popular local tracks/mountain paths which intersect the site (noted elsewhere within the report). Highland Council's Access Officer noted that there are two key aspects of the proposed development that they have to consider. 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 to the project. The Access Officer welcomes the mitigation measures and access management strategies outlined within the draft Access Management Plan. They have no objection to the proposed development subject to the submission of a finalised Access Management Plan.

7.283 As part of the finalised Access Management Plan the Access Officer has requested various details regarding the specifications of works and timings for delivery including crossing points throughout the site, the diverted estate track and bridge close to Loch Ardruighe, upgraded path to Binnien Shuas, new track along the norther side of Loch Earba, Estate tracks and footpaths, Mountain Route Diversion (dashed purple line on Figure 15-2), Proposed Estate Track/Footpath south of Loch Leamhain (dashed red line on Figure 15-2), Estate Track/Footpath north of Loch Leamhain (red line on Figure 15-3), access to crags Creag a' Chuir and Creag Pitridh during construction shall be accommodated through the shared use of the track to the east of Earba lochs and further details of mitigation measures for watersports. This is controlled by condition.

7.284 Additionally, the Access Officer has requested that Red (Specification) Surveys are submitted to cover all mountain paths. This is controlled by condition. The survey submissions should be well in advance of any proposed start to allow for adequate review and assessment in case there are substantive differences of opinion and site visits need to be undertaken.

7.285 The Access Officer notes that responsibility for delivering the agreed Access Management Plan will lie with the applicant. The applicant should inform potential contractors of the obligations under the Access Management Plan but remains responsible for compliance. Whilst the Access Officer can accept improved mitigation and accommodation measures any detrimental variations to the commitments outlined within the draft AMP will not be supported.

7.286 Mountaineering Scotland do not object to the application and also welcomed the submission of the draft Access Management Plan noting it clearly identifies and addresses the key points of public access to, and through, the location. They request that the finalised Access Management Plan retains these key elements for recreational access and that compliance is reported regularly by an Ecological Clerk of Works.

Hydrology and Water Environment

7.287 EIAR Volume 1 Chapter 6 Hydrology and Water Management notes the reservoir water level in Loch Earba is currently controlled by two dams, one at the link between Earba east and west and one at the loch outflow at the head of the Allt Labhrach. All water in Loch Earba, excluding spill, is currently reserved for hydro operations. Two new dams would be required to raise Loch Earba. The proposed development would introduce compensation flow from the foot of the Shios Dam into the Allt Labhrach. Currently no compensation flow is provided into the Allt Labhrach. The proposed compensation flow would be agreed with SEPA as part of the CAR licence. SEPA has raised no objection to the development with a concurrent CAR licence being required to control the rate at which water will be abstracted, to secure fish passages, compensation flow and method statements, as well as to regulate the timing of works. Therefore conditions for these elements will not be required.

7.288 During the initial period of construction, before filling, the construction works at the proposed Shios Dam would maintain the natural outflow from Loch Earba into the Allt Labhrach. This flow would then be abstracted for hydro power at the existing generating station until the filling process starts.

7.289 At the upper reservoir only one dam would be required on Loch Leamhain. The proposed development would release compensation flow from the foot of the Leamhain Dam which is the natural outlet of Loch Leamhain. The flow would be regulated to replicate the natural conditions in the burn using a flow range to be agreed with SEPA as part of the CAR licence. During construction of the Leamhain Dam the natural outflow from Loch Leamhain into the Allt Loch a'Bhealaich Leamhain would also be maintained. Burns that flow into the south of Loch Earba require to be diverted around the Shuas Dam and into the lower reservoir. At each abstraction point on the proposed diversion there would be provision to allow a continuous compensation flow to continue along the original burn to maintain the downstream reaches. These compensation flows would be agreed with SEPA as part of the CAR licence.

7.290 Water from the Loch Earba catchment area will be required to fill the lower reservoir prior to operation which will take a number of years. The applicant has prepared a hydrological model to simulate filling the lower Loch Earba reservoir according to a range of inflows and outflows. It is estimated that filling the lower reservoir would take between 2 to 5 years of flow capture. This filling process would temporarily impact the downstream hydroelectric schemes at Ardverikie and Lochaber with discussion ongoing between the applicant and the operators of these hydro-electric schemes in the wider surrounding area.

7.291 The proposed development would mean that there are three demands for water from Loch Earba including:

- the supply to pump to transfer water from Loch Earba to Loch Leamhain;
- a new compensation flow from Loch Earba to Allt Labhrach watercourse; and
- maintaining the existing supply of water to the Ardverikie Hydro scheme.

7.292 The lower reservoir will have a top water level (TWL) of 376m AOD which would store a total of approximately 62Mm^3 of water. Mitigation measures will ensure availability of water for the compensation flow and water to run the Ardverikie Hydro scheme with up to 7Mm^3 of "buffer" storage reserved from 62Mm^3 for the Ardverikie Hydro scheme, compensation flow and a minimum reserve for PSH operation.

7.293 The applicant notes that this buffer storage may be drawn down over the course of the year through servicing the water demands of the Ardverikie hydro and compensation flow. In very dry conditions, in order to maintain the minimum PSH operational volumes, the flows downstream of Shios Dam would revert to the pass through the natural run off. The recharge of the buffer storage would likely happen during the winter. This applicant considers this to be a conservative buffer that would provide a robust operational regime and protect the operation of the Ardverikie hydro and the provision of continuous compensation flow under normal conditions.

7.294 The maximum volume of water that would be transferred from the upper to the lower reservoir (or lower to upper) during operation of the proposed development is 55Mm^3. Based upon an installed generation capacity of up to 1800MW it would take approximately 22 hours continuous electricity production at maximum output to transfer 55Mm^3 of water from the upper reservoir to the lower reservoir. This represents the fastest maximum single continuous transfer possible. The rate of rise in the lower reservoir would be around 0.8m per hour. At the same time the rate of fall at the upper reservoir would be around 3m per hour.

7.295 Conversely, it would take longer, approximately 30 hours to transfer 55Mm^3 of water from the lower reservoir to the upper reservoir. The pumping operation typically involves a lower flow of water than generation mode. This represents the fastest maximum single continuous transfer possible. When pumping at maximum capacity the rate of fall in the lower reservoir would be 0.6m per hour. At the same time the rate of rise at the upper reservoir would be around 2.3m per hour.

7.296 The proposed development would be operated as a closed system with sufficient water to operate the full pumping or generation cycle retained within both reservoirs. Once fully operational run-off from any rainfall within the catchment areas of both reservoirs would not be stored beyond the buffer volume and would be passed into the downstream catchment. Compensation flow and any spill from the lower reservoir would flow into the Allt Labhrach and then into Loch Laggan with Ardverikie Hydro scheme continuing to discharge directly into Loch Laggan. Discharges from the upper reservoir would be designed to replicate the original natural flows to Loch Laggan via the Allt Cam and River Pattack watercourse with a range of operational discharges including occasional freshets to provide the required flow spectrum.

7.297 In terms of safety, flood risk associated with the reservoirs will be dealt with in accordance with the Reservoirs (Scotland) Act 2011 which will also ensure regular inspection and maintenance of the proposed dams. Whilst both the Shios Dam and Leamhain Dams would be designed with a spillway for reservoir safety reasons, the

applicant notes the small catchment and the large water abstraction capability make it extremely unlikely that the upper reservoir would reach spillway level. As such, the residual flow regime downstream from the dams would generally be unaffected by spill events. The proposed development would be designed with fail-safe control systems which would prevent pumping once the upper reservoir is full and the stop pumping level has been reached. These control systems would also prevent generation when the lower reservoir is full. The spillways will be designed to pass the naturally occurring extreme flood event required for reservoir safety reasons to ensure the safety of the dam structure. The Shios Dam spillway will be designed for Probable Maximum Flood (PMF) with minimal damage based on the catchment area characteristics. The design would also assume that the lower reservoir is full when a PMF occurs, a scenario that the applicant considers is unlikely. The Leamhain Dam spillway would be designed for PMF of the smaller Leamhain catchment area and again assuming that the upper reservoir is full when a PMF occurs.

7.298 The Council's Flood Risk Management Team (FRMT) note the operation of the scheme will be subject to CAR administered by SEPA. The site's CAR licence will dictate the compensation flow and any "stop generating" limits. FRMT are content with the proposed mitigation that will be put in place to manage flood risk and have no objection to the application subject to future consultation on the final "stop generating/curtailment level". This will be controlled by condition. FRMT is content that there are no sensitive receptors in the vicinity of the site and there will not be any direct impact on flood risk to others. The scheme essentially operates as a closed system, therefore, the impact on flood risk outwith the site boundary will be minimal.

Water, Flood Risk, Drainage and Peat

7.299 EIAR Volume 1 Chapter 12 Geology, Soils and Water assesses the potential effects of the proposed development on these elements during both the construction and operational phase. The defined study area extends to 500m beyond the site boundary with Ground Water Dependant Terrestrial Ecosystems (GWDTE) to at least 250m from all development. The GWDTE assessment considered designated sites and where these are water dependent and have a potential hydrological connection to the proposed development they have been considered within the evaluation (Appendix 12.4). Additionally, the assessment includes information on recorded peat depths and these have been used to prepare a site-specific Peat Management Plan (PMP) (Appendix 12.2) and Peat Landslide Hazard Risk Assessment (PLHRA) (Appendix 12.1 Volume 1 and 2). The PMP considers in detail the condition of peat and carbon rich soils that were recorded across the site of the Proposed Development. The PMP then sets out how these peat and carbon rich soils will be safeguarded as required by NPF4. A schedule of proposed permanent watercourse crossings associated with the proposed development is also provided (Appendix 12.3).

7.230 It has been shown that areas identified as being potentially moderately groundwater dependent are likely to be sustained by incident rainfall and local surface water runoff rather than by groundwater. Accordingly, the buffers proposed in SEPA's GWDTE guidance need not apply. Measures, such as permeable access tracks and regular cross track drains are proposed to safeguard existing water flow paths and maintain existing water quality. Therefore, it is considered that the majority of water dependent habitats identified by the National Vegetation Classification (NVC) mapping can be sustained. This would be confirmed, in accordance with good practice, by the

Ecological Clerk of Works (ECoW) at the time of the construction who would ensure existing surface water flow paths and water flushes are maintained. This will be controlled by condition.

7.231 The field work included investigation of private and public water supply sources in order to determine those of which might be hydrologically connected to and at risk from the proposed development. Measures required to protect these sources have been confirmed. A site-specific private water supply risk assessment (Appendix 12.5) has been prepared along with carbon balance calculations (Appendix 12.6).

7.232 Subject to the adoption of best practice construction techniques and a project specific Construction Environmental Management Document (CEMD) no significant adverse effects on the soils, geology and the water environment have been identified. This is agreed. The EIAR is clear that a CEMP will be in place that will ensure that potential sources of pollution on site can be effectively managed throughout construction and in turn during operation.

7.233 SEPA is generally content with the pollution prevention and environmental management proposals outlined in EIAR Volume 1 Chapter 20, Pollution Prevention Plan (Appendix 2.1) and outline CEMP (Appendix 2.3). Due to the scale of the development SEPA will directly control pollution prevention measures relating to surface water run off via a CAR water runoff permit. Peat and waste management issues will be covered via the requested spoil and peat management plans and are controlled by condition.

7.234 The applicant has made a commitment to deploy Sustainable Drainage Systems (SuDS) which will be required to manage surface water runoff from new hardstanding areas at the site. The final drainage design is to be provided for review and approval by FRMT which shall demonstrate that all surface water will be managed in accordance with The Highland Council's Supplementary Guidance: Flood Risk and Drainage Impact Assessment. This is controlled by condition.

7.235 Notwithstanding the safeguards noted, a programme of baseline and construction phase water quality monitoring is proposed which would be used to confirm that the proposed development does not have a significant effect on the water environment. The monitoring programme would also be used to ensure private water supplies and water dependent designated sites are safeguarded. It is proposed that the monitoring programme is to be agreed. Further, a programme of monitoring to ensure ground stability and safeguarding of peat has been proposed. These details will be controlled by condition.

7.236 SEPA encourage the avoidance, minimisation and use of peat in areas disturbed by construction activities. It welcomes the amendments made to the development, particularly the Shuas Dam relocation, to try and minimise peat disturbance. More generally, SEPA is encouraged that other elements of the development avoid the deepest peat. Even with these steps to avoid impacts on the deepest areas of peat the development will still be estimated to disturb over 250,000m^3 of peat or peaty soils and have a direct impact on near-natural condition peatland. In this case SEPA accept that total avoidance of this high-quality habitat is not possible given the specific site requirements for the pumped hydro storage scheme and note that NatureScot is content with the proposed offsetting and restoration proposals. These details will be

controlled by condition.

7.237 A Peat Landslide Hazard and Risk Assessment (PLHRA) has been submitted with the application. This states there are areas of medium risk peat instability across the site with most avoided through the mitigation by design process. For the 27 areas of medium or high risk a hazard impact assessment was completed which concluded that, with the employment of appropriate mitigation measures, all of the areas can be considered as an insignificant risk.

7.238 Watercourse crossings have been avoided in the design of the access track layout as far as possible, however, a total of 23 new watercourse crossings would be required with an existing crossing upgraded. As per SEPA's request, a condition can be applied requiring watercourse crossings WX02, WX06, WX07, WX09, WX11, WX14 to be single span bridges demonstrated to be designed to accommodate the 1 in 200 year flood event, including an allowance for climate change. All other crossings should be designed in accordance with the details outlined in the Schedule of Watercourse Crossings (Appendix 12.3).

7.239 The applicant has submitted a private water supply (PWS) risk assessment which has identified two supplies at Luiblea Cottage (PWS02) and Torgulbin (PWS03) as being potentially at risk from the proposed development. The report notes that the source location for Torgulbin was not confirmed. The assessment includes a Monitoring Protocol and Intervention Strategy which relates to a sampling program and notification procedures in the event of an incident. The report also includes provision for providing an alternative water supply if required. The Environmental Health Team note the risk assessment does not include any information on mitigation or controls to minimise the risk of contamination or interruption of the private water supplies. Whilst it refers to various other sections within the EIA a summary of mitigation measures in the PWS assessment would be preferable. Additionally, the assessment also notes that the Ardverikie Estate utilise a PWS which is taken from the existing hydro power water supply pipe from Loch Earba, however, while the report acknowledges that controls will be required to safeguard the Ardverikie Estate water supply it has not been assessed in the report on the basis that the Estate are party to the application. For the avoidance of doubt, the Environmental Health Team note that although the Estate are an interested party this is not a sufficient reason for excluding the water supply from the risk assessment.

7.240 SEPA requests the applicant provides a detailed qualitative and/or quantitative risk assessment which considers impacts on groundwater flow and quality following SEPA's LUPS-GU31 guidance note. The submission should include site specific mitigation measures and proposals for monitoring, which they recommend in line with the above guidance, includes a year's worth of monthly pre-construction monitoring and fortnightly monitoring during any works within 250m of PWS02 and Torgulbin PWS03. They also note contingency measures should pollution or interruption of the supply should also be covered. These details will be controlled by condition.

7.241 Design and construction of a suitable drainage system would follow Sustainable Urban Drainage Systems (SUDS) principles and would ensure natural drainage without significant alteration of the hydrological regime of the local site area. Any construction activity relating to, or undertaken in, the vicinity of watercourses would be carried out in general accordance with relevant SEPA Pollution Prevention Guidelines, The Water

Framework Directive (WFD), The Water Environment and Water Services (Scotland) Act 2003 (WEWS), and the Controlled Activities Regulations (CAR) 2011 (as amended).

Natural Heritage and Protected Species (Including Ornithology)

7.242 The site does not form part of any statutory or non-statutory designated sites for nature conservation. However, the site boundary of the development is adjacent to Ben Alder and Aonach Beag SAC. As such, the site's status means that the requirements of the Conservation (Natural Habitats, and c.) Regulations 1994 as amended (the 'Habitats Regulations') apply or, for reserved matters, The Conservation of Habitats and Species Regulations 2017. Consequently, Scottish Government Energy Consents Unit is required to consider the effect of the proposal on these before it can be consented (commonly known as Habitats Regulations Appraisal).

7.243 The Ben Alder and Aonach Beag SAC is designated for a variety of upland and alpine habitats, the majority of which will not be affected by the proposal. However, the blanket bog and wet heath qualifying habitats are found around the margins of Loch Pattack. The designated site lies to the south east of the proposed upper reservoir Loch a' Bhealaich Leamhain. This loch discharges into the Allt Cam river which feeds Loch Pattack which is part of the SSSI and SAC.

7.244 NatureScot agree with the conclusions set out the Shadow Habitats Regulations Assessment (HRA) and their advice is that the proposed development is likely to have a Significant effect on the Ben Alder and Aonach Beag SAC through the following pathways:

- Changes to water quality via pollution during construction and operation;
- Changes to the flow regime of Allt Leamhain and downstream aquatic habitat during construction and operation; and
- Risk of introduction of invasive non-native species via construction activities.

Consequently, the Scottish Government Energy Consents Unit, acting on behalf of the Scottish Minsters, as competent authority, is required to carry out an appropriate assessment in view of the site's conservation objectives for its qualifying interests.

7.245 Based on the information provided within the EIAR and Shadow HRA, if the proposal is carried out strictly in accordance with the mitigation set out in Section 5.4 Mitigation Measures of the Shadow HRA (p30-40), NatureScot conclude that the proposed development will not adversely affect the integrity of the site. The mitigation summarised below covers the expectations of NatureScot:

- To protect and maintain water quality via: rigorous pollution prevention measures, ECoW supervision, provision of toolbox talks, and implementing a CEMD, PPP, DMP and Water Quality Monitoring Programme;
- To protect and maintain the hydrological regime of habitats within the SAC via maintaining the natural flow rate on the Allt Leamhain and downstream aquatic habitat during construction and operation, including during the partial de-watering of Loch Leamhain during construction; and
- To control the risk of inadvertent introduction of invasive non-native species

from construction activities via implementing a BMP informed by pre-construction survey.

7.246 The Shadow HRA concludes (p40) that once mitigation has been applied, no conservation objectives would be undermined for any of the qualifying features. NatureScot agree and determine that with the proposed mitigation, there will be no adverse effect on site integrity of Ben Alder and Aonach Beag SAC.

7.247 NatureScot note the site contains priority peatland, some of which is in good condition. Total avoidance of peatland for the proposed development is not possible given the locational constraints associated with pumped storage hydro schemes. The offsetting plan is considered appropriate as there is clear detail as to how restoration areas have been selected with justification of the total area included within this plan. The proposed development has followed the mitigation hierarchy outlined in NatureScot's guidance Advising on peatland, carbon-rich soils and peatland habitats in development management (November 2023).

7.248 As part of the mitigation hierarchy the main access routes, site compounds and access tracks within the site have been altered to avoid sensitive habitats and species following the Scopng response (23/00810/SCOP). Alternative lochs for the reservoir have been considered within EIAR Volume 1 Chapter 3 Consideration of Alternatives and Design Evolution with reasoning as to why the siting of proposed development has proceeded. The relocation of the Shuas Dam and the site compound closer to the existing loch edge is an improvement on the previous design in terms of minimising the impacts on peatland habitat. This will also mean that the watercourses which flow into the area to the west of the dam will be diverted to release into the reservoir and not into the peatland. The site construction compound at the entrance to the site has been significantly reduced and moved off the peatland habitat. The access to the upper loch at Coire Pitridh has also been relocated to avoid sensitive habitats and to reduce the number of tracks required, as the proposals will incorporate the tracks to other infrastructure in the new design. Given the above, NatureScot conclude that the applicant has avoided and minimised impacts on peatland as much as possible.

7.249 The loss of habitat as a result of the proposed development will be 74.15ha loss of peatland (direct and indirect), this includes blanket bog, wet modified bog, dry modified bog and bare peat. The assessment of indirect loss has been assessed as habitats within 30m of direct losses, except for areas surrounding existing tracks, which has been reduced to 3m. No buffer has been used around areas which proposed to have floating tracks which is unusual, however, NatureScot consider the assessment of the overall peatland impacts is appropriate.

7.250 With regards to the Peat Management Plan (PMP), the proposal for the extraction and storage of peat is considered appropriate, including separating peat layers and thickness of the turves. NatureScot note the intention to cover the downstream face of the three dams with 30cm of peat, however, the practicality of this approach is not clear nor how this can be classed as a good use of peat. Reusing peat on slopes such as these will be highly susceptible to slippage and drying, as such, it is likely to erode. NatureScot cannot support this method as it is unlikely that peatland will form on this structure and ask the applicant to reconsider. These details should be removed from the updated PMP or alternatively robust justification will be required to support such an

approach.

7.251 Whilst the PMP is welcomed there are a number of uncertainties within the plan which require clarification. Peat from construction appears to be proposed to be stored for longer than is good practice before it is reused. Peat should be stored for as short a time as possible not exceeding one year. The PMP should be updated to provide more details on the storage and re-use of peat, particularly when planned reuse is beyond a year. Additionally, it is not clear what peatland restoration will be carried out as enhancement which would be in addition to the offsetting plan.

Aquatic / Terrestrial Ecology

7.252 EIAR Volume 1 Chapter 8 Terrestrial Ecology and Chapter 11 Aquatic Ecology assessed the impact of the proposed development on these ecological and species interests. Various technical field surveys were caried out including macroinvertebrate surveys, macrophyte surveys, water quality monitoring, fish habitat surveys and fish ecology surveys. Chapter 11 considers the potential effects of the proposed development on aquatic ecology (including fish fauna, fish habitat, macroinvertebrates and macrophytes) during construction and operational periods.

7.253 The proposed construction phase could potentially result in significant negative effects on aquatic ecology including the construction of the Leamhain Dam and upper reservoir, Shuas Dam, Shios Dam and lower reservoir, upper and lower control works, Pitridh and Shuas aqueducts, borrow pits and laydown areas. During operation of the presence of the dams and the operation of the reservoirs could also potentially result in significant negative effects on aquatic ecology. Various impacts were identified during the construction phased including construction works, water quality changes, de-watering of Loch Leamhain, noise, vibration, quarrying, construction lighting. Impacts during the operational phase include loss of spawning substrate, fish attraction to intake, fluctuations in water levels, habitat fragmentation, noise and vibration, light, temperature variation and water quality. Residual impacts throughout both phases include noise and vibration during construction, dust and surface run off from construction work, construction lighting, loss of spawning substrate and loss of access to watercourse spawning substrate.

7.254 Mitigation measures during the construction phase will include: the CEMP, Pollution Prevention Plan (PPP), Dust Mitigation Plan and Surface Water Quality Monitoring Programme (SWQMP) implemented by the Principal Contractor and overseen by an ACoW (Aquatic Clerk of Works) or suitably experienced ECoW, water quality sampling suite, aquatic elements will be incorporated into the Construction Noise and Vibration Management Plan (CNVMP), instream works being avoided, where practical, during sensitive spawning and localised migration periods for fish, fish rescue and relocations prior to the damming/dewatering of the watercourse, suitably sized Arctic charr identified and removed from Allt Coire Pitridh to Moy Burn to allow them to migrate into Loch Earba, appropriately designed culvert maintenance during the construction of Shuas Dam and a monitoring programme in line with Marine Scotland guidance. Such mitigation measures noted will minimise impacts and can be controlled by appropriate conditions.

7.255 Chapter 8 assessed the impact of the proposed development on terrestrial ecology which has been informed by desk based and field survey data. Various technical field

surveys were caried out including extended phase 1 habitat survey, National Vegetation Classification (NVC) Survey, GWDTE survey, protected mammal survey, bat surveys and the outline Biodiversity Enhancement Management Plan (BEMP) areas surveys. The various surveys detected evidence of common frog, common lizard, otter, water vole, red squirrel, pine marten, bat and deer within the site and surrounds. Chapter 11 considers the potential effects of the proposed development on terrestrial ecology during construction and operational periods.

7.256 Significant adverse residual effects have been identified at the local level upon invertebrates and reptiles, due to habitat loss during construction. These effects would be compensated for through habitat works and species-specific habitat features, delivered via the BEMP. Once embedded and best practice mitigation has been applied, including protected species licensing where required, non-significant residual adverse effects are predicted for all other protected species. Additional to the compensation proposed, the woodland restoration / creation, montane willow scrub and other montane habitat restoration, heathland enhancement and positive management of a range of other upland habitats via deer control, as well as the provision of bat, red squirrel and pine marten boxes, would provide significant enhancement, which would be delivered via the BEMP.

7.257 It is considered the continued best practice and appropriate mitigation measures noted will minimise the impact of the proposed development on terrestrial ecology and can be controlled by appropriate conditions.

Ornithology

7.258 EIAR Chapter 10 assessed the impact of the proposed development on ornithology which has been informed by desk based and field survey data.

7.259 Four ornithologically-designated sites are located within 5km of the proposed development (Creag Meagaidh SPA, Ben Alder SPA, Creag Meagaidh SSSI and Ben Alder and Aonach Beag SSSI) and of the 59 species recorded during the survey period. Four of those recorded are considered to have the potential to be affected by the proposed development and have been assessed (Ring Ouzel, Snipe, Teal and Common Sandpiper) with four afforded additional legal protection (Golden Eagle, Black-throated Diver, Red-throated Diver and Black Grouse).

7.260 There were three potential impacts on the bird life of the area identified during the construction phase of the proposed development (habitat loss, disturbance and displacement) with disturbance and displacement also being assessed as potential impacts during the operational phase. The assessment of ring ouzel, snipe, teal and common sandpiper determined that all species would be subjected to minor displacement and disturbance throughout the construction period. However, due to the low numbers of the birds nesting within the site all four species would only suffer low impacts from the construction phase and negligible impacts from the operational phase of the proposed development. The effects of the proposed development on all species are considered to be not significant. This is agreed.

7.261 Once standard mitigation measures are successfully implemented, including the provision of an Ecological Clerk of Works (ECoW), pre-construction monitoring of nesting birds, creating no-go zones around any sensitive nesting areas, there will be

no residual effect from the construction or operational activity of the proposed development on ornithological receptors within the area. This is agreed.

7.262 The assessment of golden eagle, black-throated diver, red-throated diver, and black grouse (Appendix 10.1 - Ornithology - Confidential Annex) determined that all species would be subjected to minor displacement and disturbance throughout the construction period. However, due to the temporary nature of the impacts, these four species would suffer negligible to low-moderate impacts from the construction phase and negligible to low-moderate impacts from the operational phase of the proposed development. The effect on all four species is considered to be not significant. Once the mitigation measures detailed in Appendix 10.1 are successfully implemented there will be no residual effect from the construction or operational activity of the proposed development on these species within the area. This is agreed.

7.263 In relation to ornithological designations, NatureScot advises that Ben Alder SPA is protected for dotterel. The site boundary for the proposed development is approximately 2km from the SPA and is unlikely to disturb the dotterel feature of the site. NatureScot agree and consider it is unlikely that the proposal will have a significant effect on any qualifying interests either directly or indirectly. An Appropriate Assessment is therefore not required.

7.264 For Ben Alder and Aonach Beag SSSI, NatureScot advise that this is notified for a variety habitats and species, including breeding bird assemblage. Black-throated divers (part of the breeding bird assemblage feature) nest on Loch Pattack, downstream from the proposed upper feeder loch of Loch Leamhain. Loch Pattack is over 2km from the site boundary for the proposed development which NatureScot consider is sufficiently distant to avoid disturbance to black-throated diver breeding on the loch. However, they advise that the mitigation measures set out in the EIAR Volume 1 Chapter 10 Ornithology chapter 10 and Ornithology Confidential Annex (Appendix 10.1) are expanded to include black-throated diver on Loch Pattack, particularly in relation to any construction related helicopter use. The applicant is not proposing to use helicopters during the main works but cannot rule out this possibility for some limited activities before the access tracks have been installed. Helicopters may be required during the Ground Investigation phase. Consideration of helicopter use in the draft Eagle Protection Plan has been included as a precaution. NatureScot consider the other qualifying habitats: Lichen assemblage, bryophyte assemblage, upland assemblage and vascular plant assemblage are unlikely to be affected provided the measures set out in the Shadow HRA Section 5.4 Mitigation Measures for the features of the SAC are applied.

7.265 With regards to ornithology, NatureScot consider the mitigation proposed for birds, as set out in Chapter 10 and Appendix 10.1 is generally appropriate. It welcomes the commitment made by the applicant to carry out further bird surveys to help inform specific mitigation for the following species; Golden eagle, black-throated diver and black grouse. NatureScot can advise the applicant further on the detailed species protection plans (SPP) for these species. The applicant has provided a draft golden eagle SPP, however, for disturbance for eagles, a 1000m buffer rather than 750m should be applied given the size and scale of the construction works and especially in a situation part of the works proposed are in sight of the nesting crag. This will be controlled by condition.

7.266 The Council's Ecology Officer states that breeding bird surveys undertaken of the site appear to be reduced with no specific raptor survey undertaken for the wider site. Historic records show a peregrine nest in the area that does not seem to have been taken into account and must be considered in future assessments and the pre-construction raptor survey. As NatureScot noted, it recommends that the golden eagle buffer zone be extended to 1km with flashing beacons to be switched off in the golden eagle traffic management zone. Consideration is also required regarding the timing of the dam construction and borrow pit works within this buffer zone.

7.267 RSPB objected to the application as it does not believe the impacts of the proposed development have been properly assessed and considers that insufficient survey work has been undertaken. NatureScot is the statutory authority with regards to natural heritage and protected species. It considers that the supporting information provided, and mitigation proposed, is appropriate and has not raised any concerns regarding the surveys provided.

7.268 Overall, the best practice and appropriate mitigation measures set out will minimise the impact of the proposed development on ornithology and can be controlled by appropriate conditions.

Habitat Loss

7.269 With the application of embedded and best practice mitigation to minimise impacts where possible and adherence to relevant legislation, significant adverse residual effects from habitat loss have been identified during construction for: blanket bog and modified bog including montane bog (at the County to national level); montane willow scrub (at the national level); unimproved calcareous grassland, base-rich marshy grassland, upland species-rich ledges, montane heath / dwarf herb, basic flush and bryophyte-dominated spring (at the County level); semi-natural woodland, wet and dry dwarf shrub heath, unimproved acid grassland, acid / neutral flushes and watercourses (at the local level). A small number of locations of some of these habitats are assessed as being sustained by groundwater. The applicant's assessment findings are agreed.

7.270 In terms of woodland loss, a locally Significant adverse effect was identified for the loss of a 5.35ha strip of habitat mapped on the Ancient Woodland Inventory (AWI) which was found to support scattered mature trees on purple-moor grass dominated vegetation, comprising remnant ancient woodland in poor condition.

7.271 The Council's Ecology Officer notes a number of habitats listed as Annex 1 of the Habitats Directive are identified within the study area, including wet and dry dwarf shrub heath and blanket bog. In total, 310.2ha habitat will be directly lost to the proposed development with a further 103.8ha of habitat loss due to indirect impacts. The Ecology Officer has no objection to the proposal, and the applicant considers there will be negligible residual impacts to these range of habitats after mitigation and compensation, and that in most cases, there will be long-term habitat enhancement with measures covered within the outline BEMP. The Ecology Officer welcomes these measures and agrees that they are appropriate.

Biodiversity Enhancement

7.272 The reported ecological and habitat losses noted would be compensated for by a significant positive effect through the implementation of a Biodiversity Enhancement and Management Plan (BEMP), which includes extensive bog restoration, native woodland restoration / creation, montane willow scrub and other montane habitat restoration, heathland restoration and management, aquatic and riparian enhancement, and other habitat restoration and management measures.

7.273 The Council's Ecology Officer noted that various mammal species were recorded at the site including otter, water vole and bats. 293.1ha of reptile habitat will also be lost. Whilst mitigation measures include the enhancement of a large area of habitat out with the proposed development site and provide ten hibernacula sites for reptiles throughout the site which will offset these impacts, they have requested additional sites for reptiles. The Ecology Officer encourages the construction of bog pools within areas of peatland restoration to provide valuable habitat for dragonflies. Additionally, they have requested that these pools include planting of food sources for Highland Nature Biodiversity Action Plan priority invertebrate species wherever possible. These details can be updated to the finalised BEMP.

7.274 EIAR Chapter 8 states that notable plant species including petty whin, downy willow, field gentian and hawkweed were recorded within the survey area. The Ecology Officer welcomes their relocation and would encourage these species to be managed to expand their range wherever possible. They have also requested further juniper planting. The Invasive Non-Native species Rhododendron was recorded within the site and this will be removed along with bracken adjacent to the lower loch. These details can be updated to the finalised BEMP.

7.275 The Ecology Officer supports the 1,496ha deer exclusion zone, comprising woodland restoration and new planting with this being a welcome enhancement to the area and will benefit a number of species. As noted by the Council's Forestry Officer, this should avoid areas of deep peat and/or priority peatland wherever possible. The Ecology Officer however disagrees that the proposed deer exclusion zone fence should not be marked given black grouse have been recorded through Ardverikie estate and as the woodland matures, it will make it more attractive to this species. Diver rafts are also advised to be placed in suitable surrounding waterbodies prior to construction to provide alternative breeding sites, as opposed to within 5 years as stated within the outline BEMP. These details again can be updated in the finalised BEMP.

7.276 It is noted that 2.69km of watercourses will be lost or altered as part of the proposed development and the outflow of the dam into the Allt Labhrach will be rewetted providing 2.2km of improved watercourse. The outline BEMP also details improvement of spawning habitat on Moy Burn. Whilst these are good enhancement measures, they do not fully offset the loss of watercourses, therefore the Ecology Officer recommends further enhancement is undertaken on other watercourses within the site boundary which may include improvement for water vole habitat and updated to the finalised BEMP.

7.277 Overall, the Council's Ecology Officer welcomes a good mix of proposed planting, including montane scrub. Much of the baseline information directing the proposed development has however been undertaken through desk-based assessment, therefore further detailed vegetation surveys are advised to inform the finalised BEMP.

7.278 NatureScot note the aim of peatland restoration is to reinstate hydrological units of peatland and to aim for near-natural condition. However, final clarification of the restoration areas will only be produced at the final BEMP stage. They welcome the ongoing management and maintenance which will ensure that any remedial work required for the peatland restoration will be carried out as required. Whilst it is noted that the peatland restoration works will be carried out over between three and five years these are programmed for the last year of the construction and the first two years of post-construction. Storage of peat (acrotelm) or turves cannot necessarily be stored and used in this timeframe. Particularly if peat has been removed in the first years of construction. NatureScot therefore require a more immediate plan for reusing peat from excavation works in the early construction.

7.279 NatureScot also welcome the aim to reduce deer numbers to no more than 8 deer per km^2 across open habitats. A deer exclosure of 1,496ha is proposed, alongside reducing the number of deer on Ardverikie Estate to 8 deer per km^2 across the remaining 11,390ha.

7.280 Mountaineering Scotland also welcomed the restoration and mitigation measures as part of the proposed development and outlined support for initiatives that result in greater habitat diversity, connectivity and provision for the regeneration of native woodlands and scrub where the land can naturally support them. It did however raise concerns regarding the extensive deer fencing required to implement these measures successfully, noting that deer fences will require self-closing gates and stiles with dog flaps to allow for recreational access.

7.281 RSPB welcome the inclusion of an outline BEMP, however, it considers the 635ha of bog restoration to be below NatureScot's recommended ratio for priority peatland habitat. The outline BEMP notes that 1031ha were identified within the estate as being suitable for restoration and requested the scale of restoration be increased to reflect this ratio. Neither NatureScot, SEPA or the Council's Ecology Officer raised such concerns with the outline BEMP and the mitigation measures proposed. Whilst the compensation ratio for blanket bog is yet to be finalised, based on the EAIR reported losses and the outline BEMP this currently stands at 1:8, with this finalised ratio expected to be agreed with NatureScot and the Planning Authority when finalising the BEMP. Whilst the peatland restoration ratio is slightly below the suggested target of the 1:10 goal of restoring 10 hectares of peatland for every 1 hectare lost, this is compensated for by trading for other habitat enhancements including the significant native woodland regeneration. Overall, the provisions set out within the outline BEMP demonstrate that significant environmental enhancement could be achieved.

Forestry

7.282 EIAR Volume 1 Chapter 10 Forestry has undertaken an assessment of the woodland that is within the site boundary of the proposed development to evaluate the potential effects on trees and woodland and recommend appropriate mitigation where adverse effects are unavoidable.

7.283 Within the site boundary there are areas of existing native woodland adjacent to the access track from Moy Bridge along with native pine and birch woodland all around the northern part of Lochan Na Earba with portions listed in the Ancient Woodland

Inventory as Ancient semi-natural origin (ASNO1860).

7.284 The applicant considers, prior to the implementation of any mitigation measures, that the loss of 7.41ha of woodland has a minor adverse effect on woodland and trees within the survey area given the total woodland cover of 111ha (representing the removal of 6.7% of the survey area). The majority of woodland loss occurs in semi-natural Scots pine woodland which requires felling to build the Shios Dam at the northern end of Loch Earba.

7.285 To mitigate the loss of woodland, a compensation ratio of at least 1:1 is required to comply with the Scottish Government's Control of Woodland Removal Policy (CoWRP). A significant compensatory planting scheme of 68.4ha of native woodland is however proposed to be planted around areas of infrastructure throughout the site. The implementation of this substantial planting plan would increase the total woodland area within the survey area from 111ha to 172ha, an increase of over 60%. Once the mitigation measures set out in Chapter 10 are implemented, the applicant considers that no significant adverse residual effects on retained woodlands will arise during the construction and operation of the proposed development.

7.286 In addition to the extensive planting noted, an area encompassing Loch Earba, Binnein Shuas, Binnein Shios and Creag a Chuir and exceeding 1000ha would be fenced off from deer to provide areas for regeneration and restoration of native woodland, including at montane elevations. Additionally, the associated circa 600ha peatland restoration project and a proposed reduction in deer densities across the wider Ardverikie Estate of 39% from current numbers, would also lead to clear benefits for woodland along with other moorland habitats. The proposed enhancements would give rise to a major positive effect on woodlands.

7.287 The Council's Forestry Officer raised no objection and welcomes the sizable compensatory planting along with the considerable area to be fenced to allow for native woodland regeneration. The proposed species mixes and planting density are accepted with further details required and controlled by condition.

7.288 The Forestry Officer notes that in the Field Study section of Chapter 10 the existing woodlands are referred to as Area 1 – 7. Whilst there are some photographs there appear to be no drawings showing their location or extent. The areas are described in outline with some detail on species and age composition and condition of the woodland areas. They note that the composition of the 7.41ha of woodland lost to the proposed development is broken down to 5.48ha of Scots pine, 0.05ha of Sitka spruce and 1.88ha of native mixed broadleaves. Reference is also made to the removal of around 500 individual trees within the working corridor.

7.289 The Forestry Officer notes that all retained trees and their root systems would be protected in the Mitigation section of Chapter 10 with the Tree Protection Plan covering trees at the junction of the access track with the A86 provided as an example (Figure 9.2). They note that further Tree Protection Plans are required and can be controlled by condition.

7.290 Whilst the Tree Planting Plan (Figure 2.38) shows the proposed planting areas they note that some planting appears to be within deep peat (Class 1) on the Carbon and Peatland map (Figure 12.3). This cannot be accepted by the Forestry Officer and the

applicant will need to ensure that the finalised Compensatory Planting Plan avoids planting on areas where peat depth is greater than 50cm.

7.291 Scottish Forestry also do not object to the application and welcomes the commitment to compensatory planting. It requests a condition securing: monitoring as part of the outline BMP, with this to specify details of further actions to ensure successful woodland establishment should natural regeneration prove unsuccessful; and a maintenance programme for compensatory planting. It also advises that the proposals would also need to be screened under by Scottish Forestry under The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017 separate to the planning process. Any additional felling which is not part of the planning application will also require permission from Scottish Forestry under the Forestry and Land Management (Scotland) Act 2018 (the Act). They raise no objection to the application subject to a condition regarding the submission and review of further information regarding felling, restocking and compensatory planting proposals.

7.292 Overall, a substantial amount of additional woodland would be created should the proposed development proceed.

Built and Cultural Heritage

7.293 EIAR Volume 1 Chapter 16 Cultural Heritage considers the potential for both direct and indirect impacts on archaeological sites and sites of historic or cultural heritage interest as a result of the proposed development. The site is located in a landscape of sparse features of settlement and land use dating from the Early Modern period to the late 19th century, notably features of a sporting estate developed in 1873. The applicant has undertaken targeted survey work has been completed across the site of the proposed development, following a detailed desk-based evaluation. The potential for further visible archaeological features is considered to be Low to Negligible.

7.294 The assessment concludes that direct significant impacts, the worst assessed as Moderate, are considered on two non-designated recorded sites, a shieling group and cairn, and a 19th Century track causeway. The potential for sub-surface or submerged features liable to be disturbed during ground works or during the operational phase of the proposed development is Low to Negligible.

7.295 Within the wider area of Loch Laggan there are a number of cultural heritage sites of national importance. However, these were scoped out of this assessment given the limited visibility. The assessment concludes that there would be no potential significant indirect impacts as a result of the Proposed Development. The findings withing Chapter 16 are agreed with no built heritage concerns being raised by the Council's Historic Environment Team or Historic Environment Scotland.

Other Material Considerations

7.296 A representation questioned whether pumped storage hydro development can be considered to produce renewable energy. The proposed development would operate in two modes. In the "generating" mode the proposed development would produce electricity by releasing water from the upper reservoir through the reversible pump turbines and into the lower reservoir. In the "pumping" mode electricity would be imported from the grid to pump water through the reversible pump turbines from the

lower reservoir up to the upper reservoir. Pumped hydro storage schemes are essentially large scale batteries. In the “generating” mode they can be considered to produce renewable energy as the electricity generated by releasing water from the upper reservoir to the lower reservoir drives turbines in tunnels. Power is required to pump water from the lower reservoir to the upper reservoir in the “pumping mode” and in that sense the proposed development is not a renewable energy scheme in the same way as a wind farm, for example. It is however, described as “a reliable source of renewable electricity” in the Scottish Government’s Draft Energy Strategy and Just Transition Plan (2023) along with the strong support in principle from NPF4. It is noted this technology will play an increasingly important role in the transition to net zero, providing flexibility to the grid and helping to secure a resilient and secure energy supply.

7.297 In terms of the design life of the facility, whilst the applicant notes that the proposal could feasibly remain operational indefinitely if maintained appropriately, safeguards need to be put in place to cover the proposed development ceasing operation with the usual decommissioning and restoration requirements secured. If the decision is made to decommission the pumped hydro storage scheme, moveable infrastructure would be removed, underground tunnels would be sealed, generation plant machinery would be removed. Where removal of infrastructure would result in more damage than leaving in place, it would be left in-situ, for example the dams, with disturbed ground reinstated, unless otherwise agreed with the Planning Authority. It is important to ensure that any approval of this project secures by condition a requirement to deliver a draft Decommissioning and Restoration Plan (DRP) for approval prior to the commencement of any development and ensure an appropriate financial bond is put in place to secure these works. The finalised DRP would be expected to be submitted to and approved in writing by the Planning Authority in consultation with SEPA and NatureScot no later than 12 months prior to the final decommissioning of the site. The detailed DRP would then be implemented within 18 months of the final decommissioning of the development, unless otherwise agreed in writing with the Planning Authority.

7.298 Given the complexity of national developments, and to assist in discharge of conditions, the Planning Authority usually seeks that the developer employs a Planning Monitoring Officer (PMO). The role of the PMO, amongst other things, would include the monitoring of, and enforcement of compliance with, all conditions, agreements and obligations related to this permission (or any superseding or related permissions) and shall include the provision of a bi-monthly compliance report to the Planning Authority.

7.299 There are no other material considerations.

Non-Material Considerations

7.300 Representations raise concerns that there is an over-provision of renewable energy development within the wider Highland region. Whilst there are various renewable projects in the wider surrounding area, all such proposals require assessment on their own merits and are rightly subject of individual applications. NPF4 makes clear that grid capacity should also not constrain renewable development.

7.301 Representations raise concerns that the associated grid connection and substation have not been included as part of the pumped storage hydro application. Whilst it is

correct that a grid connection, comprising a 400kV cable and a substation adjacent to the Beauly to Denny overhead transmission line, is required to connect the proposed development to the national electricity grid, this will be subject to a separate consenting process with SSEN Transmission as the applicant for regulatory reasons. Whilst the applicant and Community Councils have tried to engage with SSEN Transmission for further discussion regarding the future substation proposal it is understood there has been limited feedback. If the proposed development is consented, its connecting associated infrastructure is subject to a separate consenting process with that proposal requiring assessment on its own merit, having regard to any potential in combination cumulative effects.

7.302 In response to other non-material considerations raised: community benefit is voluntary and holds no weight in the planning determination process as explained in the Socio-economics section of this report; financial risk to the developer is not material to the planning merits of the scheme; who the applicant is and their corporate structure is not relevant to Highland Council's consideration of the proposal with the named operator of scheme potentially changing in future; and the named agent on the application is not a material consideration in the determination process, with the supporting EIAR having been undertaken by a wider design team with suitable experience and technical expertise.

8. MATTERS TO BE SECURED BY LEGAL AGREEMENT

8.1 The Developer Contributions Supplementary Guidance (DCSG) was adopted in November 2018. This guidance sets out the Council's approach to mitigating the impacts of development on services and infrastructure by seeking fair and realistic developer contributions to the delivery of such facilities. Energy developments are treated as industrial developments within the DCSG. Although The Highland Council is only a consultee in this case, the DCSG forms part of the approved development plan and therefore Scottish Ministers should apply its terms.

8.2 Owing to the development being served by the Trunk Road Network, no contributions are required to the local road network. The applicant has however committed to making a financial contribution to enable Transport Scotland to undertake a scheme of localised improvements to the road network for the benefit of all road users prior to works commencing on the proposed. The mechanism for securing this has not been confirmed, however, the Planning Authority advocate this to be secured by legal agreement, prior to the issue of any consent.

8.3 In relation to public art, physical direct provision on, or in close proximity to the site would be appropriate, or elsewhere across the estate with provision of resting / sheltered areas at vantage points along affected walking routes, with consideration given to the select provision of interpretation boards if deemed appropriate. Scope for public art provision is therefore secured by condition, with scope for alternative form of public art to be explored further in consultation with interested parties, including the Community Liaison Group.

8.4 In terms of green infrastructure and the delivery of biodiversity, given the Estate's wider ownership and the application area size, then this should be possible without the need for financial contributions towards off-site measures, thereby removing the need

for this to be secured by legal agreement.

8.5 A decommissioning and restoration financial guarantee can be secured by condition. Therefore, no further legal agreements are required should consent be granted.

9. CONCLUSION

9.1 The Scottish Government gives considerable commitment to renewable energy and supports the development of pumped storage hydro development where it can operate successfully and are sited appropriately. The project has potential to contribute to addressing the climate emergency through significant additional renewable energy generation. In this regard it is anticipated to contribute an additional 1800MW of installed capacity and make a meaningful contribution toward addressing climate change on the road to net zero. In addition, the development has potential to bring economic benefits to the area, creating job opportunities and other socio-economic benefits, particularly during the considerable construction phase, reflective of the scale of this national development.

9.2 However, as with all applications, a balancing exercise must be undertaken. The benefits of the proposal must be weighed against potential drawbacks and then considered in the round, taking account of the relevant policies of the Development Plan, which includes NPF4, as well as all other material planning considerations. As noted in this report, a key consideration is the collective visual and landscape effects, with proposal having struck an appropriate balance. While some Significant landscape and visual effects would occur, these are confined to locations in relative close proximity, and are well contained to users of the outdoors on more elevated recreational routes and at hill summits. Where such adverse landscape and visual effects would occur, typically around the lower reservoir and its associated infrastructure, this would reduce over time and be suitably mitigated. The upper reservoir and associated infrastructure would however give rise to a more noticeable change, principally given the scale of the upper dam, along with the extent of the upper reservoir drawdown impact. Collective effects on the local landscape composition are generally appropriate, and the extent and severity of visual impact effects remain within acceptable limits.

9.3 The temporary construction phase would give rise to a wider range of Significant adverse landscape and visual effects for recreational receptors. Such shorter term adverse visual effects would occur at 8 visualisation locations falling within a 5km radius. These would reduce over time once the pumped storage hydro scheme becomes operational with substantial areas of woodland planting, landscaping and other mitigation measures taking hold. Once the scheme becomes operational, longer term residual Significant adverse effects would remain for people on the access tracks in the vicinity, represented by VL6 - Proposed access track to North East of Loch Earba and VL7 - Proposed access track to south-east of Lochan na h-Earba, as well as from VL9 – Binnein Shuas, near summit. These locations are limited to users of tracks directly alongside the upper reservoir and hill routes and summits immediately overlooking the upper reservoir. It has however been evidenced from the EIAR that such effects have been well considered, with the proposed development being generally well sited in terms of separation from residential receptors, access roads and other recreational routes, with the proposed development’s visibility being relatively

well contained, particularly given the scale of the project.

9.4 It is accepted that the design of the pumped storage hydro scheme has had to balance competing demands, including landscape character and visual amenity considerations; environmental constraints; topography and ground conditions; and technological and operational requirements. The applicant has explained for people who frequent this area, how the proposal would be experienced and how its design has sought to address the receptors at each representative viewpoint location. It is considered that the proposed development has been appropriately designed to address the constraints of the area.

9.5 There are also clear impacts that might be expected from this proposed development, particularly during its construction. These can be managed through best practice construction management techniques to ensure surrounding interests, particularly road access, recreational route access and the amenity of local communities is safeguarded from the key impacts of the development. The recommended suite of planning conditions will strengthen and clarify the plans and supporting environmental information provided by the applicant.

9.6 Notwithstanding the nature and scale of the proposal, there has been a relatively low level of public representations, 2 objections and 1 general comment received by the Council along with 16 objections received by Energy Consents Unit. Whilst their concerns have assisted with the assessment of the application and considering the adequacy of the mitigation measures proposed, it is considered that there are no issues that merit the proposal to be re-located, re-configured or refused.

9.7 In addition to the representation noted, objections were received from non-statutory consultees (John Muir Trust, Royal Society for the Protection of Birds, Scottish Wild Land Group and British Lichen Society). Notably, Mountaineering Scotland do not object, owing principally to the renewable energy credentials of the scheme and the proposed wider estate management and biodiversity enhancement proposals. The host community council Laggan Community Council object and although neighbouring Spean Bridge, Roy Bridge and Achancarry Community Councils have raised concerns, they do not object. Outwith those noted, no other consultees have objected to the proposed development subject to conditions which are to be incorporated.

9.8 The application can be supported in the context of the Council's Development Plan, and in particular, NPF4 Policy 1 – Tackling the Climate and Nature Crises, Policy 3 – Biodiversity and Policy 11 – Energy, as well as HwLDP Policy 67 – Renewable Energy, with there being underlying support for pumped storage hydro development within NPF4. All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations. The proposal can be considered to benefit from in principle support, with the extent of landscape and visual effects as well as all other construction impacts being outweighed by the contribution the development would make toward tackling climate change. The proposed development also contains proposals for substantial habitat management and restoration measures, which could, if appropriately conditioned, lead to peatland, forestry and biodiversity enhancement throughout the site and wider estate.

9.9 Schedule 9 of the Electricity Act sets out what an applicant shall do in relation of the preservation of amenity. It is considered that the proposal has had regard to the desirability of preserving natural beauty and has mitigated the effects of the development in relation to the effects on the natural beauty of the countryside. This is by virtue of the location, setting and design of the pumped storage hydro scheme, resulting in landscape and visual impacts which can be accommodated. Officers are also satisfied that environmental effects of this development can be addressed by way of mitigation, with the suggested conditions incorporating a schedule of mitigation and operational compliance monitoring should permission be forthcoming by Scottish Ministers.

10. IMPLICATIONS

10.1 Resource: There are significant staffing and financial resource implications if the application is to be subject to a Public Local Inquiry.

10.2 Legal: If an objection is raised to the proposal, the application may be subject to a Public Local Inquiry.

10.3 Community (Equality, Poverty and Rural): Not applicable

10.4 Climate Change/Carbon Clever: The proposal has the ability to make a meaningful contribution toward the production of renewable energy.

10.5 Risk: Not applicable

10.6 Gaelic: Not applicable

11. RECOMMENDATION

Action required before consultation response issued to Scottish Ministers: N

11.1 It is recommended to **RAISE NO OBJECTION** to the application subject to:

A. The Committee granting delegated authority to the Area Planning Manager - South to respond to the Scottish Government's Energy Consents Unit regarding any future Further / Supplementary Environmental Information, where that does not:

   i) materially increase the scale of the proposed development; and

   ii) result in any additional significant adverse environmental effects; and

   iii) does not undermine or remove mitigation which was secured within the Council's previous consultation response on the application;

B. The conclusion of a legal agreement, or an alternative suitable mechanism to secure contributions to toward Trunk Road network improvements for the A889 and the A86;

C. The Committee granting delegated authority to the Area Planning Manager - South to agree the finished condition wording, with any substantive amendments to be subject to prior consultation with the Chair of the South

Planning Applications Committee; and

D. The following conditions and reasons.

Conditions and Reasons to be attached to any Section 36 consent which may be approved

1. **Notification of Date of First Commissioning**

Written confirmation of the Date of First Commissioning and the Date of Final Commissioning shall be provided to the Planning Authority and the Scottish Ministers no later than one calendar month after those dates.

Reason: To allow the Planning Authority and Scottish Ministers to calculate the date of expiry of the consent.

2. **Commencement of Development**

(1) The Commencement of development shall be no later than 7 years from the date on which this consent is granted, or in substitution, such other period as the Scottish Ministers may hereafter direct in writing.

(2) Written confirmation of the intended date of Commencement of development shall be provided to the Planning Authority and the Scottish Ministers no later than one calendar month before that date.

Reason: To ensure that the consent is implemented within a reasonable period and to allow the Planning Authority and the Scottish Ministers to monitor compliance with obligations attached to this consent and deemed planning permission as appropriate.

3. **Non-assignation**

(1) This consent shall not be assigned without the prior written authorisation of the Scottish Ministers. The Scottish Ministers may authorise the assignation, with or without conditions.

(2) The Company shall notify the Planning Authority and the Scottish Ministers in writing of the name of the assignee, principal named contact and contact details within fourteen days of the consent being assigned.

Reason: To safeguard the obligations of the consent if transferred to another company.

4. **Serious Incident Reporting**

In the event of any breach of health and safety or environmental obligations relating to the Development during the period of this consent, the Company will provide written notification of the nature and timing of the incident to the Planning Authority and the Scottish Ministers, including confirmation of remedial measures taken and/or to be taken to rectify the breach, within 24 hours of the incident occurring.

Reason: To keep the Scottish Ministers informed of any such incidents which may be in the public interest.

Conditions to be attached to any deemed planning permission

5. **Implementation in Accordance with Approved Plans**

(1) Except as otherwise required by the terms of the section 36 consent and deemed planning permission, the Development shall be undertaken in accordance with the application:

(a) including the approved drawings;

(b) the Environmental Impact Assessment Report ("the EIAR"); and

(c) other documentation lodged in support of the application.

Reason: To ensure that the Development is carried out in accordance with the approved details.

6. **Site Investigation Works**

The site investigation works shall not commence until a detailed scheme of all site investigation works (including off-site and on-site works) has been submitted to and approved in writing by the Planning Authority. This shall include a timetable for all investigation works and enabling works and shall be submitted a minimum of 3 months in advance of the proposed date of commencement of any site investigation works

Reason: To ensure the final details of the enabling works and site investigation works have regard for rural setting of the Development Site and the potential impact of such works on the infrastructure of the area

7. **Site Enabling Works**

The Site Enabling Works shall not commence until a detailed scheme of all Site Enabling Works (including off-site and on-site works) has been submitted to and approved in writing by the Planning Authority. This shall include a timetable for all enabling works and shall be submitted a minimum of 1 month in advance of the proposed date of commencement of any Site Enabling Works.

Reason: To ensure the final details of the Site Enabling Works have regard for the rural setting of the Development Site and the potential impact of such works on the infrastructure of the area.

8. **Finalised Design**

No development shall commence until the final design details for that specific element of the development have been submitted to, and agreed in writing by, the Planning Authority, in consultation with NatureScot and SEPA:

- Leamhain Dam and upper reservoir, including tailrace inlet and outlet structures, upper control works, isolation gates and isolation gate house, tailrace, spillway, dam bottom outlet control, valve house and any associated landscaping and/or planting;
- Shuas Dam, including Shuas aqueduct and any associated landscaping and/or planting;
- Shios Dam, including spillway, valve structure and any associated

landscaping and/or planting;

- Powerhouse, including gate shafts, switchyard, tailrace inlet and outlet structures, lower control works, isolation gates, welfare facilities and any associated landscaping and/or planting;
- Tailrace, tunnel portals and surge shafts;
- All above ground facilities including site compounds, worker accommodation, administration buildings, recreational facilities, any other associated external infrastructure, parking areas and any associated landscaping and/or planting;
- All roads, access tracks, water-crossings and footpaths to serve each phase of the Development;
- Borrow pits;
- Promontories on Lochan na h-Earba;
- Site establishment areas to serve each phase of the Development;
- All site boundary treatments and external lighting provisions;
- All mitigation measures to be implemented in association with the project as set out in the Environmental Impact Assessment Report, or as amended by the above plans or agreed with statutory consultees prior to determination and not specified in this consent; All work shall thereafter be carried out in accordance with the approved design details.

Reason: To ensure the final design details of the Development have regard for the rural setting of the Development Site within a Wild Land Area and Special Landscape Area and the commitment to high quality design as set out in the Environmental Impact Assessment Report and the Further Environmental Information Report.

9. **Elevations and Site Formation Levels**

a) No development shall commence commence on each phase noted for Condition 8 Finalised Design until elevation, and cross section drawings of the proposed above ground infrastructure, have been submitted to and approved in writing by the Planning Authority. These details shall include:

i) The external materials, colours and finishes of all external structures and site fencing with a non-reflective finish to be specified throughout;

ii) any raised areas of hardstanding to support all onsite infrastructure; and

b) No element of the development shall have any text, sign or logo displayed on any external surface of the facility, save those required by the applicant's safety systems and law under other legislation; and

Thereafter, the development shall be built out in accordance with these approved details and, with reference to part (a) above, the site shall be maintained in the approved colour, free from rust, staining or discolouration until such time as the development is decommissioned

Reason: In the interest of visual amenity.

10. **Construction Environment Management Document**

No later than three months prior to the Commencement of the Development, a Construction Environment Management Document (CEMD) shall be submitted for the writing approval of the Planning Authority, in consultation with SEPA, NatureScot, Environmental Health and any other consultees as appropriate. The development shall then proceed in accordance with the approved CEMD unless otherwise agreed in writing by the Planning Authority. The CEMD shall include details of:

a) An updated Schedule of Mitigation (SM) as it relates to construction highlighting mitigation set out within each chapter of the Environmental Impact Assessment Report (EIAR), within the EIAR Supplementary Environmental Information (SEI), and the conditions of this consent; Processes to control / action changes from the agreed SM; Construction Environmental Management Plans (CEMPs) for the construction phase, covering:

i) Habitat and Species Protection;

ii) Construction Environmental Management Plan (CEMP)

iii) Mitigation measures to protect the ecological resources on site, including biodiversity protection zones, location and timing of works;

iv) Construction Method Statements;

v) Pollution Prevention and Control;

vi) Dust Management, covering demolition and construction activity, including vehicle movements;

vii) Construction Noise and Vibration (refer to Condition 11);

viii) Construction Method Statements;

ix) Temporary Site Lighting;

x) Site Waste Management;

xi) Surface and Ground Water Management, including: drainage and sediment management measures from all construction areas including access tracks; drainage by SUDS to accommodate the 1 in 200 plus an allowance for climate change; mechanisms to ensure that construction will not take place during periods of high flow or high rainfall; and a programme of water quality monitoring;

xii) Surface Water Quality Monitoring Programme implemented by the Principal Contractor and overseen by an ACoW (Aquatic Clerk of Works) or suitably experienced ECoW;

xiii) Peat Management Plan (refer to Condition 32);

xiv) Soil Management, with details of soil placement and measures to utilise the soils' existing seed base in the finalised landscaping plan;

xv) Public and Private Water Supply Protection Measures, including a programme of water quality monitoring;

xvi) Emergency Response Plans;

xvii) Timetable for post construction restoration/reinstatement of the temporary working areas and construction compound;

xviii) Phasing plans for the construction; and

xix) Other relevant environmental management as may be relevant to the development.

b) A statement of responsibility to 'stop the job/activity' if a breach or potential breach of mitigation or legislation occurs; and

c) Methods for monitoring, auditing, reporting, and the communication of environmental management on site and with client, Planning Authority and other relevant parties.

Reason: To ensure protection of surrounding environmental interests and general amenity.

11. **Construction Noise and Vibration Management Plan**

Prior to commencement of the development, the applicant shall submit, for the approval of the planning authority, a finalised Construction Noise and Vibration Management Plan.

Reason: In the interest of safeguarding community and residential amenity.

12. **Blasting Method Statement**

Prior to any blasting activities within the development, the applicant shall submit, for the approval of the planning authority, a Blasting Method Statement which describes how the best practicable means for minimising the impact of blasting on sensitive receptors.

Reason: In the interest of safeguarding community and residential amenity.

13. **Dust Mitigation**

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.

Reason: In the interest of safeguarding community and residential amenity.

14. **Construction Traffic Management Plan**

Prior to commencement of deliveries to site, a Construction Traffic Management Plan must be submitted to and approved by Transport Scotland to ensure that the impact of construction vehicles is minimised within the Study Area to a level which is considered to be not significant. This should include estimates of the construction traffic movements, likely routing to and from the site and details of any large or abnormal loads. Forecast HGV movements using the trunk road junctions should be explicitly identified.

Reason: To minimise interference and maintain the safety and free flow of traffic on

the Trunk Road as a result of the traffic moving to and from the development.

15. **Trunk Road Access**

The proposed means of access to the trunk road should be submitted for approval by the Planning Authority in consultation with Transport Scotland as trunk road authority.

Reason: To minimise interference with the safety and free flow of the traffic on the trunk road.

16. **Abnormal Loads**

Prior to commencement of deliveries to site, the proposed route for any abnormal loads on the trunk road network must be submitted to and approved by the Planning Authority, in consultation with Transport Scotland as the trunk roads authority.

Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

17. **Accommodation of Abnormal Loads**

Prior to the movement of any abnormal load, any accommodation measures required on the trunk road network, including the removal of street furniture, junction widening and traffic management must be approved and implemented to the satisfaction of the Planning Authority, in consultation with Transport Scotland.

Reason: To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

18. **Temporary Traffic Measures**

Prior to the movement of any components and/or construction materials, any additional signing or temporary traffic control measures deemed necessary on the trunk road network due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland.

Reason: To ensure that the transportation of any components/materials will not have any detrimental effect on the road and structures along the route.

19. **Wheel Cleaning**

The development shall not become operational until vehicle wheel cleansing facilities have been installed and brought into operation on the site, the design and siting of which shall be subject to the prior approval of the planning authority in consultation with Transport Scotland.

Reason: To ensure that material from the site is not deposited on the trunk road to the detriment of road safety.

20. **Watercourse Crossings**

Watercourse crossings WX02, WX06, WX07, WX09, WX11, WX14 shall be single

span bridges demonstrated to be designed to accommodate the 1 in 200 year flood event, including an allowance for climate change, unless otherwise agreed by the planning authority in consultation with SEPA

Reason: To ensure that all watercourse crossings are free from flood risk and do not exacerbate flood risk elsewhere.

21. **Sustainable Urban Drainage Systems**

No development shall commence until full details of all surface water drainage provision within the application site (which should accord with the principles of Sustainable Urban Drainage Systems (SUDS) and be designed to the standards outlined in Sewers for Scotland Second Edition, or any superseding guidance prevailing at the time) have been submitted to, and approved in writing by, the Planning Authority. Thereafter, only the approved details shall be implemented and all surface water drainage provision shall be completed prior to the first occupation of any of the development.

Reason: To ensure that surface water drainage is provided timeously and complies with the principles of SUDS; in order to protect the water environment.

22. **Stop Generating/Curtailment**

Prior to the site becoming operational details of the finalised stop generating/curtailment level shall be submitted to and confirmed by the Planning Authority, in consultation with SEPA and Flood Risk Management Team.

Reason: To ensure that flood mitigation measures are provided.

23. **Borrow Pits**

All borrow pits shall be worked and restored in line with the details outlined in the Mass Balance Strategy (Appendix 2.4) and Borrow Pit Plans (EIAR Volume 2 Figure 2.2.1, Figure 2.2.2, Figure 2.2.3, Figure 2.2.4 and Figure 2.2.5).

Reason: To ensure that excavation of materials from the borrow pit(s) is carried out in a manner that minimises the impact and to secure the restoration of borrow pit(s) at the end of the construction period.

24. **Excavated Material**

Should there be a requirement to excavate further material on site not already outlined in the Mass Balance Strategy (Appendix 2.4) and Borrow Pit Plans (EIAR Volume 2 Figure 2.2.1, Figure 2.2.2, Figure 2.2.3, Figure 2.2.4 and Figure 2.2.5) further details should be provided and information on the volume of material to be used, the manner it is to be used and a justification for the need for the works. For the avoidance of doubt there should be no long-term storage of material on site and material should only be temporarily stored within the identified construction areas unless agreed with the planning authority in consultation with SEPA.

Reason: To ensure that excavation of materials from the borrow pit(s) is carried out in an appropriate manner.

25. **Recreational Access Management Plan**

No development shall commence until a finalised Recreational Access Management Plan (RAMP) has been submitted to, and agreed in writing by, the Planning Authority. The updated plan should look to maintain public access during construction of the development, as far as it is practicable and safe to do so, and thereafter enhance public access during the operation of the development. This shall include delivering net improvements to the accessibility of access paths on completion of the development. The plan as agreed shall be implemented in full, unless otherwise approved in writing by the Planning Authority.

Reason: In the interests of maintain public access rights and pedestrian safety.

26. **Mountain Paths**

No Development shall commence until Red (Specification) Surveys for all mountain paths, have been submitted and agreed in writing by, the Planning Authority. Details shall be submitted 2 months in advance of any proposed start to allow for site visits if required.

Reason: To comply with the Council's statutory duty to uphold access rights all mountain paths.

27. **Public Art**

No development shall commence on site until a scheme for the inclusion of public art within the development and/or outwith the development, including types and locations of artworks and the management, maintenance thereof, and a timescale for implementation has been submitted to, and approved in writing by, the Planning Authority. The approved scheme shall be implemented in accordance with the timescales contained in the approved scheme and maintained in perpetuity.

Reason: In the interests of amenity.

28. **Operational Management Plan**

Prior to the energisation of the development, a site Operational Management Plan shall be submitted to, and approved in writing by the Planning Authority in consultation with SEPA, Environmental Health and any other consultees as appropriate. This plan shall detail:

a) An updated Schedule of Mitigation (SM) as it relates to the operational phase of the development highlighting mitigation set out within each chapter of the Environmental Impact Assessment Report (EIAR), within the EIAR Supplementary Environmental Information (SEI), and the conditions of this consent;I Processes to control / action changes from the agreed SM;i

b) Landscape management and drainage maintenance.

Thereafter, the OMP shall be implemented in accordance with the approved details from first commissioning of the development until the cessation of the use of the development, unless otherwise agreed in writing by the Planning Authority.

Reason: In the interest of environmental amenity, pollution prevention, maintaining

water quality, and provision of adequate parking and charging facilities.

29. **Operational Noise**

All plant, machinery and equipment associated with this development shall be so installed, maintained and operated such that the following standards are met: -

1. Noise arising from the development, when measured and/or calculated as an LZeq, 5min, in the 100Hz one third octave frequency band must not exceed 30 dB, at the curtilage of any noise sensitive premises.
2. The Rating Level of noise arising from the development, as determined in accordance with BS4142:2014+A1:2019 Methods for Rating and Assessing Industrial and Commercial Sound shall not exceed 27dB(A) at the curtilage of any noise sensitive receptor.

Reason: In the interest of safeguarding community and residential amenity.

30. **Private Water Supplies**

Prior to the commencement of the development including enabling works, the applicant is required to submit an updated private water supplies risk assessment which includes the following:

1. A summary of mitigation/control measures to minimise contamination or disruption of any supply.
2. Confirmation of the location of the supply source for PWS03 Torgulbin.
3. Details of the finalised monitoring protocol and intervention strategy
4. For the avoidance of doubt the risk assessment must include the supply serving the Ardverikie Estate

Reason: In the interest of environmental amenity, pollution prevention and maintaining water quality.

31. **Private Water Supply Appraisal**

No development shall commence until an appraisal to demonstrate that private water supplies will be safeguarded by the development with full details of assessment and monitoring of private water supply PWS03 Torgulbin. This shall include:

I. A qualitative and/or quantitative risk assessment which considers impacts on groundwater flow and quality following SEPA's LUPS-GU31 guidance note.

II. Site specific mitigation measures and proposals for monitoring following SEPA's LUPS-GU31 guidance note.

III. Contingency measures should there be pollution or interruption of supply.

This appraisal shall be carried out by an appropriately qualified person(s) and shall specify the means by which a water supply shall be provided and thereafter maintained to the development. The appraisal shall be submitted and approved in writing by the Planning Authority, in consultation with Environmental Health and SEPA.

Reason: In the interest of environmental amenity, pollution prevention and maintaining water quality

32. **Peat Management Plan**

The Plan shall be developed in consultation with SEPA and submitted to and approved in writing by, the Planning Authority. The Peat Management Plan shall draw upon the findings of any approved Environmental Impact Assessment, Peat Slide Risk Assessment, consider the findings of any additional ground investigations carried out prior to development commencing and include a management/reinstatement scheme for all peat areas within the application site, including:

i. Details and plans for all peat and soil stripping and excavation and the storage and proposed use and replacement of peat, topsoil and subsoil; and

ii. A method statement setting out the measures to protect peat during excavation, storage, handling and reuse.

The Peat Management Plan (PMP) shall take due consideration of the mineral and slope stability of the site identified in the peat landslide risk assessment and shall have regard to the drainage implications of soil movement and storage.

The Plan shall be implemented as approved.

Reason: To ensure that a plan is in place to deal with the storage and reuse of peat within the application site, including peat stability and slide risk.

33. **Habitat Management Plan**

(1) No later than three months prior to the Commencement of the Development, a finalised habitat management plan (HMP), shall be submitted to and approved in writing by the Planning Authority, in consultation with SEPA.

(2) The HMP shall set out proposed habitat management of the site during the period of construction and operation of the site.

(3) The HMP shall include information on how and where any disturbed peat that cannot be used in site reinstatement will be used for peat restoration. This should include (a) location plan of the proposed peatland re-use/restoration area, clearly showing size of individual areas where peat re-use is proposed and total area to be restored, with this including the delivery of improvement to good **quality of at least 600ha of peatland** (b) evidence, in the form of photographs, aerial imagery, or surveys to demonstrate that the area identified is appropriate for peat re-use and is capable of supporting carbon sequestration and (c) basic calculations which demonstrate that the proposal will make use of all excavated material (this information could alternatively be included in the Peat Management Plan).

(4) The HMP shall include post construction measures for the most sensitive habitats, peatland restoration proposals, provide enhancement of Annex 1 habitats, habitats for protected species and birds.

(5) The approved HMP will include provision for regular monitoring and review to be undertaken to consider whether amendments are needed to better meet the habitat plan objectives. In particular, the approved habitat management plan will be updated to reflect ground condition surveys undertaken following construction and

prior to the date of Final Commissioning and submitted to the Planning Authority for written approval, in consultation with SEPA.

(6) Unless otherwise approved in advance in writing with the Planning Authority, the approved HMP shall be implemented in full.

(7) GIS Shapefiles must be supplied of the compensation and enhancement areas to the Planning Authority prior to the commencement of works.

Reason: In the interests of the protection of the habitats identified in the EIAR and EIAR Supplementary Environmental Information.

34. **Pre-Construction Ecological Survey**

A pre-construction survey is required to been undertaken not more than 3 months prior to works commencing on each phase noted for Condition 8 Finalised Design and a report of the survey has been submitted to, and approved in writing by, the Planning Authority. The survey shall cover both the application site and an appropriate buffer from the boundary of application site and the report of survey shall include mitigation measures where any impact, or potential impact, on protected species or their habitat has been identified. Development and work shall progress in accordance with any mitigation measures contained within the approved report of survey and the timescales contain therein.

Reason: To ensure that the site and its environs are surveyed and the development does not have an adverse impact on protected species or habitat.

35. **Pre-construction Raptor Survey**

A pre-construction raptor survey must be undertaken of the development site and the recommended disturbance distances as specified by NatureScots guidance. The results of this survey must be used to inform Species Protection Plans.

Reason: To provide a robust baseline for raptors to inform mitigation required.

36. **Biodiversity Enhancement and Management Plan (BEMP)**

I. There shall be no Commencement of Development unless and until a final Biodiversity Enhancement and Management Plan (BEMP) has been submitted to, and approved in writing by the Planning Authority.

II. The BEMP shall set out proposed habitat management of the site including all mitigation, compensation and enhancement measures, during the period of construction and operation, and shall detail the long term management regimes of the compensation and enhancement measures required of the site. The compensation and enhancement measures must be managed in perpetuity.

III. The BEMP shall include provision for regular monitoring and review to be undertaken against the BEMP objectives and measures for securing amendments or additions to the BEMP in the event that the BEMP objectives are not being met.

IV. Unless and until otherwise agreed in advance in writing with the Planning Authority, the approved BEMP (as amended from time to time with written

approval of the Planning Authority) shall be implemented in full.

Reason: In the interests of protecting ecological features and to ensure that the development secures positive effects for biodiversity.

37. **Environmental Clerk of Works (EnvCoW)**

An Environmental Clerk of Works (EnvCoW) will incorporate the roles of an Ecological Clerk of Works (ECoW).

There shall be no Commencement of Development unless and until the terms of appointment of an independent Environmental Clerk of Works (EnvCoW) by the Company have been submitted to, and approved in writing by, the Planning Authority. This must include a EnvCoW schedule, detailing when the EnvCoW shall be present on site. For the avoidance of doubt, the EnvCoW shall be appointed as a minimum for the period from the commencement of development to the final commissioning of the development and their remit shall, in addition to any functions approved in writing by the Planning Authority, include (but not be limited to):

a) Impose a duty to monitor compliance with the environmental commitments provided in the EIA Report as well as the following (the EnvCoW works):
    i. the Pre-Construction Ecological Survey under Condition 34;
    ii. the Construction Environmental Management Plan under Condition 37;
    iii. the Peat Management Plan under Condition 32;
    iv. the Habitat Management Plan under Condition 33.
b) Providing training to the developer and contractors on their responsibilities to ensure that work is carried out in strict accordance with environmental protection requirements;
c) Require the EnvCoW to report to the nominated construction project manager any incidences of non-compliance with the EnvCoW works at the earliest practical opportunity;
d) Require the EnvCoW to report to the Planning Authority any incidences of non-compliance with the EnvCoW Works at the earliest practical opportunity
e) Maintains a Register of all inspections and audits, to include an inventory of all measures on the site, their effectiveness, as well as any advice provided;
f) Require the EnvCoW to report to the Planning Authority monthly, with a concise summary of the actions on site.

Require a statement that the EnvCoW shall be engaged by the Planning Authority but funded by the developer. The EnvCoW shall be appointed on the approved terms throughout the period from Commencement of Development to completion of construction works and post-construction site reinstatement works.

Reason: To secure effective monitoring of and compliance with the environmental mitigation and management measures associated with the Development during the construction phase.

38. **Species Protection Plans**

There shall be no commencement of works unless and until all required Species Protection Plans have been agreed in writing by the Planning Authority.

Reason: to ensure the protection of species present on site during construction and operation of the development.

49. **Biosecurity Plan**

A biosecurity plan must be submitted to the planning authority prior to the commencement of works.

Reason: To prevent the introduction of invasive species within the site and prevent the spread of invasive species within the site.

40. **Nesting Birds**

Construction works have the potential to disturb nesting birds or damage their nest sites, and as such, a nesting bird survey should be made, not more than 24 hours prior to the commencement of development if this coincides within the main bird breeding season (March - August inclusive) and throughout the breeding bird season if new areas are being developed or there has been a break in construction. All wild bird nests are protected from damage, destruction, interference and obstruction under the Wildlife and Countryside Act 1981 (as amended). Some birds (listed on schedule 1 of the Wildlife and Countryside Act) have heightened protection where it is also an offence to disturb these birds while they are in or around the nest.

Reason: to ensure all nesting birds are protected as per the legislation.

41. **Fence Marking**

The deer exclusion zone fence must be marked to reduce the potential for black grouse collision shall undergo regular fence parameter searches for bird strikes and if any are recorded then mitigation such as fence marking shall be implemented in consultation with the Planning Authority. Collision surveys should be undertaken of the fence during the three-monthly fence inspections for bird species. Any collisions must be recorded and any mitigation undertaken. This must be reported to the Planning Authority within the required monitoring reports.

Reason: to reduce potential impacts to black grouse.

42. **Data**

GIS Shapefiles must be supplied of the compensation and enhancement areas to the Planning Authority prior to the commencement of works.

Reason: To allow the compensation and enhancement areas to be mapped to ensure no developments occur on these sites for a minimum of 30 years.

43. **Tree Protection Plan**

No development, site excavation or groundwork shall commence on each phase noted for Condition 8 Finalised Design until Tree Protection Plans in accordance with BS 5837:2012 (Trees in Relation to Design, Demolition and Construction) are

submitted to and subsequently approved in writing by the planning authority. Thereafter, all retained trees will be protected against construction damage using protective barriers located as per the approved Tree Protection Plans. These barriers shall remain in place throughout the construction period and must not be moved or removed during the construction period without the prior written approval of the Planning Authority.

Reason: In order to ensure the protection of retained trees, which are important amenity assets, both during construction and thereafter.

44. **Arboricultural Consultant**

A suitably qualified Arboricultural consultant must be employed by the applicant to ensure that the approved Tree Protection Plans are implemented to the agreed standard. Stages requiring supervision are to be set out in a Supervision Statement for the written agreement of the planning authority and certificates of compliance for each stage are to be submitted for approval.

Reason: To ensure the protection of retained trees throughout the construction period.

45. **Compensatory Planting**

No development shall commence until a detailed scheme of Compensatory Planting (including future maintenance) has been submitted and approved in writing by the planning authority. All planting shall be implemented in full prior to first commissioning of the pumped storage scheme, or as otherwise agreed with the planning authority. The planting shall be maintained thereafter in accordance with the approved scheme, until established to the full satisfaction of the planning authority.

Reason: To protect Scotland's woodland resource, in accordance with the Scottish Government's policy on the Control of Woodland Removal.

46. **Lighting**

Prior to the first commissioning of the development, details of any external lighting, or any externally visible internal building lighting, shall be submitted to and approved in writing with the Planning Authority. The lighting shall thereafter be constructed and maintained in accordance with the approved details.

Reason: In the interests of visual amenity, to minimise light pollution and to ensure the development does not have an adverse impact on nocturnal animals.

47. **Socio-Economic Benefit**

No later than 15 months after the date of final commissioning of the development, a report demonstrating the project has met the minimum socio-economic benefit assumptions provided within the Environmental Impact Assessment Report, received 11 March 2024, for both the development's construction period and initial 12 month operational period, for both Highland and Scotland, shall be submitted for the written approval of the Planning Authority.

The Scheme shall include the following:

a) details of how the initial staff/employment opportunities at the development will be advertised and how liaison with the Council and other local bodies will take place in relation to maximising the access of the local workforce to information about employment opportunities;

b) details of how sustainable training opportunities will be provided for those recruited to fulfil staff/employment requirements including the provision of apprenticeships or an agreed alternative;

c) a procedure setting out criteria for employment, and for matching of candidates to the vacancies;

d) measures to be taken to offer and provide college and/or work placement opportunities at the development to students within the locality;

e) details of the promotion of the Local Employment Scheme and liaison with contractors engaged in the construction of the development to ensure that they also apply the Local Employment Scheme so far as practicable having due regard to the need and availability for specialist skills and trades and the programme for constructing the development;

f) a procedure for monitoring the Local Employment Scheme and reporting the results of such monitoring to the Council; and

g) a timetable for the implementation of the Local Employment Scheme.

Thereafter, the development shall be implemented in accordance with the approved scheme.

Reason: In order to ensure compliance with NPF4 Policy 11c) and to maximise the local socio-economic benefits of the development to the wider community. To make provision for publicity and details relating to any local employment opportunities.

48. **Decommissioning, Restoration and Aftercare Strategy**

No development shall commence unless and until a Decommissioning, Restoration, and Aftercare Strategy has been submitted to, and approved in writing by, the Planning Authority. The strategy shall outline measures for the decommissioning of the development along with the restoration and aftercare of the site, and shall include proposals for the removal of individual components of the development as well as the treatment of ground surfaces, and, the management and timing of the works and environmental management provisions which shall include, but not be limited to, the following:

a) site waste management plan (dealing with all aspects of waste produced during the decommissioning, restoration and aftercare phases);

b) details of measures to be taken to prevent loose or deleterious material being deposited on the road network, including wheel cleaning and lorry sheeting facilities, and measures to clean the site entrances and the adjacent local road network;

c) a pollution prevention and control method statement, including arrangements for the storage and management of oil and fuel on the site;

d) details of measures for soil storage and management;

e) a surface water and groundwater management and treatment plan, including details of the separation of clean and dirty water drains, and location of settlement lagoons for silt laden water;

f) temporary site illumination;

g) management and timing of the works; and

h) a traffic management plan to address any traffic impact issues during the decommissioning period.

Reason: To ensure the decommissioning and removal of the development, along with the site's restoration in an appropriate and environmentally responsible manner in the interests of safety, amenity, and environmental protection.

49. **Decommissioning, Restoration and Aftercare Plan**

In the event that the development is no longer operational for a period of 3 years, or the operator, leaseholder and / or landlord advises that the development is no longer going to be operated, whichever is earliest, a detailed decommissioning, restoration and aftercare plan, based upon the principles of the approved decommissioning, restoration and aftercare strategy, shall be submitted for the written approval of the Planning Authority in consultation with SEPA. The detailed decommissioning, restoration and aftercare plan shall provide updated and detailed proposals, in accordance with relevant guidance at that time, for the removal of the Development, the treatment of ground surfaces, the management and timing of the works and environment management provisions which shall include (but is not limited to):

a) site waste management plan (dealing with all aspects of waste produced during the decommissioning, restoration and aftercare phases);

b) details of measures to be taken to prevent loose or deleterious material being deposited on the local road network, including wheel cleaning and lorry sheeting facilities, and measures to clean the site entrances and the adjacent local road network;

c) a pollution prevention and control method statement, including arrangements for the storage and management of oil and fuel on the site;

d) details of measures for soil storage and management;

e) a surface water and groundwater management and treatment plan, including details of the separation of clean and dirty water drains, and location of settlement lagoons for silt laden water;

f) temporary site illumination;

g) management and timing of the works;

h) a traffic management plan to address any traffic impact issues during the decommissioning period.

The Development shall be decommissioned, the site restored and aftercare undertaken in accordance with the approved plan.

Reason: To ensure that should the development no longer be required an appropriate mechanism is in place for decommissioning of the development.

50. **Financial Restoration Guarantee**

No development shall commence until:

(1) Full details of a guarantee, bond or other financial provision to be put in place to cover all of the decommissioning and site restoration measures outlined in the Decommissioning, Restoration and Aftercare Strategy approved under Condition 49 of this permission have been submitted to, and approved in writing by, the Planning Authority. For the avoidance of doubt the bond must be able to be called upon by The Highland Council and be enforceable against the operator and landowner and/ or leaseholder; and

(2) Confirmation in writing by a suitably qualified independent professional that the amount of financial provision proposed under part (1) above is sufficient to meet the full estimated costs of all decommissioning, dismantling, removal, disposal / recycling, site restoration, remediation and incidental work, as well as associated professional costs, has been submitted to, and approved in writing by, the Planning Authority; and

(3) Documentary evidence that the guarantee, bond or other financial provision approved under parts (1) and (2) above is in place has been submitted to, and confirmation in writing that the financial provision is satisfactory has been issued by, the Planning Authority.

(4) Thereafter, the Operator, and Leaseholder and/or Landowner, shall:

a) Ensure that the guarantee, bond or other financial provision is maintained throughout the duration of this permission; and

b) Pay for the guarantee, bond or other financial provision to be subject to a review five years after the commencement of development and every five years thereafter until such time as the development is decommissioned and the site restored.

(5) Each review shall be:

a) conducted by a suitably qualified independent professional; and

b) published within three months of each five year period ending, with a copy submitted upon its publication to both the landowner(s) and the Planning Authority; and

c) approved in writing by the Planning Authority without amendment or, as the case may be, approved in writing by the Planning Authority following amendment to their reasonable satisfaction.

Where a review approved under part (c) above recommends that the amount of the guarantee, bond or other financial provision should be altered (be that an increase or decrease) or the framework governing the bond or other financial provision requires to be amended, the Operator, and Leaseholder and/or Landowner shall do so within one month of receiving that written approval, or another timescale as may be agreed in writing by the Planning Authority, and in accordance with the recommendations contained therein.

Reason: To ensure that there are sufficient funds to secure the implementation of the Decommissioning, Restoration, and Aftercare Strategy at the time of the development's decommissioning.

51. **Community Liaison Group**

No development shall commence until a community liaison group is established by the applicant, in collaboration with the Planning Authority and affected local Community Councils.

The group shall act as a forum for the community to be kept informed of project progress and, in particular, should allow advanced dialogue on the provision of all transport related mitigation measures and to keep under review the timing of the delivery of abnormal loads and performance of the Construction Traffic Management Plan.

This should also ensure that local events and tourist seasons are considered and appropriate measures to co-ordinate deliveries and work with these and any other major / national projects in the area to ensure no conflict between construction traffic and the increased traffic generated by such events / seasons / developments.

The liaison group, or element of any combined liaison group relating to this development, shall be maintained until the construction of the development and all site infrastructure becomes fully operational.

Reason: To assist project implementation, ensuring community dialogue and the delivery of appropriate mitigation measures for example to minimise potential hazards to road users, including pedestrians, travelling on the road networks.

52. **Planning Monitoring Officer**

No development shall commence until the Planning Authority has approved in writing the terms of appointment by the applicant of a suitably qualified environmental specialist to assist the Planning Authority in monitoring compliance with the planning permission and conditions attached to this consent. The terms of Planning Monitoring Officer (PMO) appointment shall:

a) Impose a duty to monitor compliance with the planning permission and conditions attached to this consent;

b) Require the PMO to submit a report at least every three months to the Planning Authority, or monthly at the further written request of the Planning Authority, summarising works undertaken on site; and

c) Require the PMO to report to the Planning Authority any incidences of non-compliance with the planning permission and conditions attached to this consent at the earliest practical opportunity.

The PMO shall be appointed on the approved terms throughout the period from the commencement of development to completion of post construction restoration works.

Reason: To enable the development to be suitably monitored to ensure compliance with the consent issued.

REASON FOR DECISION

All relevant matters have been taken into account when appraising this application. It is considered that the proposal accords with the principles and policies contained within the Development Plan and is acceptable in terms of all other applicable material considerations.

REASONED CONCLUSION

The Council is in agreement with the findings of the Environmental Impact Assessment Report and Supplementary Environmental Information for the extension of Earba Pumped Storage Hydroelectric Scheme including creation of Leamhain Dam and upper reservoir, Shuas Dam, Shios Dam and lower reservoir, underground waterway system and associated structures, powerhouse and indoor electrical switchyard, Pitridh and Shuas aqueducts, new access junction from the A86, upgraded and new access tracks and footpaths, site compounds and worker facilities, borrow pits, new and upgraded watercourse crossings and one upgraded crossing, landscaping and earthworks, tree planting, peat and habitat compensation/enhancement, deer fencing and other ancillary works. Whilst the proposed development will produce some significant landscape and visual effects, particularly during the construction period but also extending into the early operational period in and around the lower reservoir, continuing well into the operational period in and around the upper reservoir, to receptors using the surrounding recreational paths and Munro summits, it is considered the significant effects have been contained where possible. The Highland Council is satisfied that environmental effects of this development can be addressed by way of mitigation. The Council has incorporated the requirement for a schedule of mitigation within the conditions of this permission. Monitoring of construction and operational compliance has been secured through Conditions 10, 11, 12, 13, 14, 20, 21, 22, 23, 24, 25, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 43, 45, 51 and 52 of this permission.

Signature: David Mudie

Designation: Area Planning Manager – South

Author: Roddy Dowell

Background Papers: Documents referred to in report and in case file.

Relevant Plans:

Document Type	Document No	Version No	Date Received
Plan 1 – Location Plan	EAR/GEL/001	P1	11.03.2024
Plan 2 – Site Layout Plan	EAR/GEL/002	P1	11.03.2024
Plan 3 – Upper Leamhain Reservoir Plan	EAR/GEL/301	P1	11.03.2024
Plan 4 – Leamhain Dam General Arrangement	EAR/GEL/302	P1	11.03.2024
Plan 5 – Lower Earba Reservoir Plan	EAR/GEL/201	P1	11.03.2024
Plan 6 – Shios Dam General Arrangement	EAR/GEL/203	P1	11.03.2024
Plan 7 – Shuas Dam General	EAR/GEL/220	P1	11.03.2024

Arrangement			
Plan 8 – Promontories General Arrangement	EAR/GEL/230	P1	11.03.2024
Plan 9 – Tunnel Section	EAR/GEL/502	P1	11.03.2024
Plan 10 – Powerhouse cross section	EAR/GEL/402	P1	11.03.2024
Plan 11 – Access Site Compound SC1 and Borrow Pit BP1 Plan and Sections	EAR/GEL/170	P1	11.03.2024
Plan 12 – Worker Camp Site Compounds SC2A and SC2B Plan and Sections	EAR/GEL/180	P1	11.03.2024
Plan 13 – Powerhouse Site Compound SC3 Plan and Sections	EAR/GEL/181	P1	11.03.2024
Plan 14 – Lower Reservoir Site Compound SC5 and Borrow Pit BP3 Plan and Sections	EAR/GEL/172	P1	11.03.2024
Plan 15 – Shios Dam Site Compounds SC6A and SC6B	EAR/GEL/183	P1	11.03.2024
Plan 16 - Shios Dam Borrow Pit BP4 Plan and Sections	EAR/GEL/173	P1	11.03.2024
Plan 17 – Surge Shaft Site Compound SC7 Plan and Sections	EAR/GEL/184	P1	11.03.2024
Plan 18 – Upper Reservoir Site Compound SC8 Plan	EAR/GEL/190	P1	11.03.2024
Plan 19 – Upper Reservoir SC8 Section	EAR/GEL/191	P1	11.03.2024
Plan 20 – Upper Reservoir Borrow Pit BP5A and BP5B Section	EAR/GEL/174	P1	11.03.2024
Plan 21 – Access Routes and Footpaths During Construction	EAR/GEL/022	P1	11.03.2024
Plan 22 - Access Routes and Footpaths During Construction	EAR/GEL/023	P1	11.03.2024

Appendix 2 – Development Plan and Other Material Policy Considerations

DEVELOPMENT PLAN

National Planning Framework 4 (NPF4) (2023)

A3.1 The NPF4 policies of most relevance to this proposal include

National Development 2 (NAD2) – Pumped Hydro Storage

National Development 3 (NAD3) Strategic Renewable Electricity Generation and Transmission Infrastructure

1 - Tackling the climate and nature crisis.

2 - Climate mitigation and adaptation

3 - Biodiversity

4 - Natural places

5 - Soils

6 - Forestry, Woodland and Trees

7 - Historic assets and places

11 - Energy

12 - Zero waste

13 - Sustainable transport

18 - Infrastructure first

20 - Blue and green infrastructure

22 - Flood risk and water management

23 - Health and safety

25 - Community wealth benefits

26 - Business and industry

29 - Rural development

33 - Minerals

Highland Wide Local Development Plan (HwLDP) (2012)

A3.2 28 - Sustainable Design

29 - Design Quality and Place-making

30 - Physical Constraints

31 - Developer Contributions

36 - Wider Countryside

51 - Trees and Development

52 - Principle of Development in Woodland

53 - Minerals

55 - Peat and Soils

56 - Travel

57 - Natural, Built and Cultural Heritage

58 - Protected Species

59 - Other important Species

60 - Other Importance Habitats

61 - Landscape

62 - Geodiversity

63 - Water Environment

64 - Flood Risk

65 – Waste Water Treatment

66 - Surface Water Drainage

67 - Renewable Energy Developments

69 - Electricity Transmission Infrastructure

72 - Pollution

73 - Air Quality

74 - Green Networks

77 - Public Access

78 - Long Distance Routes

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

A3.3 The area plan's focus is mainly on regional and settlement strategies and identifying specific site allocations.

Other Highland Council Supplementary Guidance

A3.4

- Biodiversity Enhancement Planning Guidance (May 2024)
- Developer Contributions (Mar 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland Historic Environment Strategy (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Sustainable Design Guide (Jan 2013)

- Trees, Woodland and Development (Jan 2013)
- Special Landscape Area Citations (Jun 2011)
- Highland Renewable Energy Strategy and Planning Guidelines (May 2006)

OTHER MATERIAL POLICY CONSIDERATIONS

A3.5 Apart from the components of the approved development plan outlined above, whilst there are no notified nor validated Local Place Plans for the proposed site there is a notified Local Place Plan nearby whose preparation is being led by Spean Bridge, Roy Bridge and Achnacarry Community Council. The Local Place Plan will define collective community aspirations which should be useful for the applicant, consultees and Scottish Government in assessing and addressing community benefit and wealth building issues.

Emerging Highland Council Development Plan Documents and Planning Guidance

A3.6 The Highland-wide Local Development Plan is currently under review and is at Main Issues Report Stage. It is anticipated the Proposed Plan will be published following publication of secondary legislation post National Planning Framework 4.

A3.7 In addition, the Council has further advice on delivery of major developments in a number of documents. This includes Construction Environmental Management Process for Large Scale Projects (Aug 2010) and The Highland Council Visualisation Standards for Wind Energy Developments (Jul 2016).

Other National Guidance

A3.8
- Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 – interim and annual targets replaced by Climate Change (Emissions Reduction Targets) (Scotland) Bill in November 2024
- Climate Change Committee Report to UK Parliament (July 2024)
- UK Government Clean Power Action Plan (Dec 2024)
- Draft Energy Strategy and Just Transition Plan (2023)
- Draft Scottish Biodiversity strategy to 2045: tackling the nature emergency (2023)
- Scottish Energy Strategy (2017)
- 2020 Routemap for Renewable Energy (2011)
- Energy Efficient Scotland Route Map, Scottish Government (2018)
- Siting and Designing Wind Farms in the Landscape, SNH (2017)
- Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (2020)
- Wind Farm Developments on Peat Lands, Scottish Government (2011)
- Historic Environment Policy for Scotland, HES (2019)

- PAN 1/2011 - Planning and Noise (2011)
- PAN 60 – Planning for Natural Heritage (2008)
- Circular 1/2017: Environmental Impact Assessment Regulations (2017)

Appendix 3 - Compliance with the Development Plan / Other Planning Policy

National Policy

A4.1 NPF 4 forms part of the Development Plan and was adopted in February 2023. It comprises three parts:

- Part 1 – sets out an overarching spatial strategy for Scotland in the future. This includes spatial principles, national and regional spatial priorities, and action areas;
- Part 2 – sets out policies for the development and use of land to be applied in the preparation of local development plans; local place plans; masterplans and briefs; and for determining the range of planning consents. This part of the document should be taken as a whole in that all relevant policies should be applied to each application; and
- Part 3 – provides a series of annexes that give the rationale for the strategies and policies of NPF4, it outlines how the document should be used, and sets out how the Scottish Government will implement the strategies and policies.

A4.2 **Part 1 - the Spatial Strategy** explains the unprecedented national challenges and need to reduce greenhouse gas emissions and adapt to future impacts of climate change. It sets out that that Scotland's environment is a national asset which supports the nation's economy, identity, health and wellbeing and explains that choices need to be made on sustainable use of natural assets in a way which benefits communities. The spatial strategy reflects legislation in setting out decisions required in the long-term public interest. However, in doing so it is clear that the right choices about where development should be located need to be made to ensure clarity over the types of infrastructure provided and the assets that should be protected to ensure they continue to benefit future generations. The Spatial Priorities support the planning and delivery of sustainable places to reduce emissions, restore and better connect biodiversity; liveable places for better and healthier lives; and productive places where there is a greener, fairer and more inclusive wellbeing economy.

A4.3 At the national level, NPF4 considers that pumped hydro storage along with strategic renewable electricity generation and transmission infrastructure will assist in the delivery of the Spatial Strategy and Spatial Priorities for the north of Scotland, and that Highland can continue to make a strong contribution toward meeting Scotland's ambition for net zero. Alongside these ambitions, the strategy for Highland aims to protect environmental assets as well as to stimulate investment in natural and engineered solutions to address climate change. This aim is not new and will clearly require a balancing exercise to be undertaken, which is reflected throughout NPF4.

A4.4 The proposed development is of national importance for the delivery of the national Spatial Strategy, whereby in principle support for this type of development is established. The proposed development constitutes NPF4 National Development 2 - Pumped Hydro Storage. Additionally, as the proposed development would be capable of generating over 50MW, it is of a type and scale that constitutes NPF4 National Development 3 - Strategic Renewable Electricity Generation and Transmission Infrastructure.

A4.5 **Part 2 – Policies: NPF4 Policies 1, 2, and 3** now apply to all development proposals Scotland-wide, which means that significant weight must be given to the global climate and nature crises when considering all development proposals, as required by NPF4 Policy 1. To that end, development proposals must be sited and designed to minimise lifecycle greenhouse gas emissions as far as is practicably possible in accordance with NPF4 Policy 2, while contributing to the enhancement of biodiversity, as required by NPF4 Policy 3.

A4.6 NPF4 Policy 3 Biodiversity intends to protect biodiversity, reverse biodiversity loss, deliver positive effects and strengthen nature networks. Under NPF4's policy emphasis on biodiversity, all forms of development are required to include appropriate measures to conserve, restore and enhance biodiversity proportionate to the nature and scale of development. The requirement to deliver biodiversity enhancement is a new duty

A4.7 Highland Council's Biodiversity Enhancement Planning Guidance was adopted in 2024 and is a material consideration. It is aimed at developers, agents, architects and their consultants. The guidance explains the approach that is required by the Highland Council to deliver biodiversity conservation, restoration and enhancement through the planning system. This guidance has been prepared to support the application of the National Planning Framework 4 (NPF4) and is intended to be used in conjunction with relevant national and local policy and planning guidance. Scottish Government has published draft biodiversity planning guidance setting out the Scottish Ministers' expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome "improving biodiversity".

A4.8 In September 2023, the Scottish Government released independent research conducted by SRUC on "Approaches to Measuring Biodiversity in Scotland". The report's findings and recommendations propose practical steps for achieving a consistent, cross-government approach to measuring biodiversity at the site level. Specifically targeting the planning sector, NatureScot has initiated efforts to create an adapted Page 4 of 9 biodiversity metric tailored for supporting the implementation of Policy 3b in National Planning Framework 4. This new tool aims to assist developers and planning authorities in evaluating the biodiversity enhancements resulting from developments. It will be applicable to major development projects, aligning with the goals of NPF4. While based on a metric utilised in England, it will be refined to suit Scotland's requirements.

A4.9 The design of the proposed development has sought to implement the NPF4 Mitigation Hierarchy with steps taken for avoidance and minimisation, prior to

restoration and offsetting. It is noted that the applicant's Outline Biodiversity Enhancement and Management Plan (OBEMP) proposes measures that will conserve, restore and enhance biodiversity including nature networks. The sufficiency of the avoidance and minimisation, along with the detail of the restoration and offsetting proposals, together with other enhancement as detailed in the OBEMP (Appendix 8.6) is considered appropriate.

A4.10 The proposed ecological compensation and enhancement measures noted in Section 2.6 of the applicant's Planning Statement, are welcome. These measures include:

- Proposals for peatland restoration extending to at least 600ha;
- A deer exclosure area (Appendix 8.6) extending to approximately 1,500ha which would be fenced off from deer to provide areas of regeneration and encourage the restoration of native woodland;
- A deer control area outwith the deer exclosure area extending to approximately 11,390ha within which the objective would be to reduce deer density from the current 13.2 deer per km^2 to 8 deer per km^2 representing a 39% reduction in deer numbers; and
- An increased in woodland planting within the Ardverkie Estate from 111ha to 172ha, an increase of over 60%.

A4.11 While NPF4 considers national developments as a focus for delivery, they should also 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 the following proposals:

- Development proposals which contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. This could include for example improving community resilience and reducing inequalities; increasing spending within communities; ensuring the use of local supply chains and services; local job creation; supporting community led proposals, including creation of new local firms, and enabling community led ownership of buildings and assets.
- Development proposals linked to community ownership and management of land will be supported. Following consultation, the Highland Council's Community Wealth Building Strategy 2024-2027 was agreed by the Council on 19 September 2024. The strategy provides a framework that sets out how the Council will utilise different activities to maximise the impact of investment in local areas and support more local ownership of assets and wealth. The finalised version of the strategy will be uploaded to the Council's website in due course.

A4.12 The applicant's proposed continuation of conversations with local stakeholders in regard to local housing could align well with the "Land and property" Objective in the Community Wealth Building Strategy 2024-2027. This states

that a key Outcome is “Increasing the supply of affordable housing”, with three actions as part of the Housing Challenge noted as:

- Develop options for increasing finance for housing.
- Develop options for increasing the number and variety of developments.
- Develop options to increase land supply.

The applicant’s Planning Statement states that there could be approximately 500 people employed on site during the peak construction phase, with construction worker numbers varying depending on the stage of the works (the applicant anticipates that the construction phase will take approximately five or six years). It is noted that Section 4.27 of the Planning Statement states that, once operational, the proposed development could generate up to the equivalent of 46 full-time jobs taking account of multiplier effects, which is stated as equating to a gross value added (GVA) impact of £2 million to the local Highland economy per year.

A4.13 Complementing those policies is NPF4 Policy 4 Natural Places, which sets out that development proposals by virtue of type, location, or scale that have an unacceptable impact on the natural environment will not be supported. The policy goes on to clarify what that means for different designations. It sets out that proposals with likely significant effects on European sites (SACs or SPAs) require appropriate assessment, and that development proposals that will affect a National Park, NSA or SSSI will only be supported where:

i) the objectives of designation and the overall integrity of the areas will not be compromised; or

ii) any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

A4.14 Similarly, sites designated in Development Plans for local nature conservation or Special Landscape Areas (SLAs) are protected in NPF4 Policy 4 unless the development will not result in significantly adverse effects on its qualities or its integrity, or these effects are clearly outweighed by social, environmental, or economic benefits of at least local importance. The most significant policy change for Natural Places brought about by NPF Policy 4 is with regard Wild Land Areas, which states that renewable energy developments that support national targets will be supported in Wild Land Areas (WLA) and that buffer zones around WLAs will not be applied, so that effects of development out with WLAs will not be a significant consideration.

A4.15 Policy 6 aims to protect and expand forests, woodland and trees with significant protection offered to Ancient Woodland with a presumption against woodland removal without appropriate compensatory planting. 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”. It is considered the proposal is generally in overall conformity with NPF4 Policy 6 given the significant compensatory planting scheme of 68.4ha of native woodland around areas of infrastructure throughout the site.

A4.16 Policy 11 intent is to “encourage, promote and facilitate all forms of renewable energy development onshore and offshore. This includes energy generation, storage, new and replacement transmission and distribution infrastructure and emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS)”. It specifies that the principle of all forms of renewable, low-carbon, and zero emission technologies is supported (with the exception of wind farm proposals located in National Parks or National Scenic Areas).

A4.17 It states that development proposals should only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities. The policy goes on to say that significant weight will be placed on the contribution of the proposal to renewable energy generation targets and on greenhouse gas emissions reduction targets, while identifying impacts, including cumulative impacts, that must be suitably addressed and mitigated against. Policy 11 e) i to xiii) sets out the criteria against which applications must be assessed.

A4.18 This includes a broad range of matters similar those to be assessed under HwLDP Policy 67 including landscape and visual impacts. It advises that where impacts are localised and/or appropriate design mitigation has been applied such effects will generally be considered acceptable. While the adopted NPF4 reflects a stronger presumption in favour of all national scale energy developments, judgment is still required at the project level to ensure proposals do not have unacceptable landscape and visual impacts even if the contribution to national renewable energy targets is considerable.

A4.19 On that point it is noted that both legislation and planning law indicate that where there may be incompatibility between NPF4 and the Local Development Plan (LDP) (HwLDP, WestPlan and Highland Council Supplementary Guidance) published prior to NPF4, then the more recent document shall prevail. Notwithstanding however, in instances of incompatibility, this requirement may not eliminate the provisions of the LDP in their entirety whilst these documents remain an extant part of the adopted Development Plan. That means that the Council may wish to still give considerable weight to the provisions of its LDP over national policies where there is strong justification for doing so, such as where the Council feels that LDP policy is better equipped to respond to local matters of importance or site-specific conditions for example.

A4.20 It is considered the proposal is generally in overall conformity with NPF4 Policy 11. Policy 11 e) ii., e) viii. and e) ix. requires the proposed development project

design and mitigation will demonstrate how the following impacts are addressed:

- Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable;
- effects on hydrology, the water environment and flood risk; and
- biodiversity including impacts on birds.

A4.21 The proposed development will have some significant adverse landscape and visual impacts on a range of features/receptors (including but not restricted to) Wild Land Area 14 - Rannoch-Nevis-Mamores-Alder and Ben Alder, Laggan and Glen Banchor Special Landscape Area. However, significant landscape and visual effects have been contained to a relatively localised surrounding area with various mitigation measures reducing impacts further, particularly at the operational stage of the development.

A4.22 Given the nature of pumped hydro storage, the proposed development will have a significant impact on hydrology, the water environment and flood risk. However, various mitigation measures will minimise any significant adverse effects.

A4.23 The proposed development will have a significant impact on biodiversity with the removal of trees, peat and other habitat. However, various mitigation measures including substantial tree planting, peatland restoration, deer control along with other biodiversity enhancement will minimise any significant adverse effects and lead to significant betterment within the site and wider Estate.

A4.24 Additionally, whilst the generality of HwLDP's topic policies are superseded by those in NPF4 HwLDP policies that offer greater detail than NPF4 or that are tailored to Highland circumstance (and are not wholly incompatible with NPF4) are still relevant and may be applicable. In particular, Policy 57 Natural, Built and Cultural Heritage, Policy 61 – Landscape and Policy 67 Renewable Energy given the location within Wild Land Area 14 - Rannoch-Nevis-Mamores-Alder and Ben Alder, Laggan and Glen Banchor Special Landscape Area and with the proposed development being pumped hydro storage.

A4.25 it is considered the proposal is in overall conformity with Policy 57, Policy 61 and Policy 67 of HwLDP. Policy 57 requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. The following criteria will also apply:

- For features of local/regional importance development will be allowed if it can be satisfactorily demonstrated that they will not have an unacceptable impact on the natural environment, amenity and heritage resource; and
- For features of national importance development will be allowed if it can be shown not to compromise the natural environment, amenity and

heritage resource. Where there may be any significant adverse effects, these must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services.

A4.26 In terms of Policy 67, whilst the proposed development would contribute towards meeting renewable energy generation targets and generally have a positive effect on the local and national economy the Council has to be satisfied that it is located, sited and designed not to be significantly detrimental overall, either individually or cumulatively with other developments, having regard in particular to any significant effects on the following:

- Natural, built and cultural heritage features;
- Visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations);
- Amenity at sensitive locations, including residential properties, work places and recognised visitor sites (in or outwith a settlement boundary); and
- The amenity of users of any Core Path or other established public access for walking, cycling or horse riding;

A4.27 **Part 3: Annex B – National Developments Statements of Need**. National developments are significant developments of national importance. Appendix B identifies 18 types of national development which will support the delivery of the spatial strategy. The statements of need set out in the Appendix are a requirement of the Town and Country Planning (Scotland) Act 1997). Any project identified as national development is required to be considered at a project level to ensure all statutory tests are met.

This project is classified as National Development under Annex B Section 2 Pumped Hydro Storage and Section Strategic Renewable Electricity Generation and Transmission Infrastructure including:

a) On and off shore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;

A4.28 This brings the application under the tests set out under Policy 11. As noted earlier, it is considered the proposal is in overall conformity with NPF4 Policy 11.

Highland wide Local Development Plan (HwLDP)

A4.29 The HwLDP identifies the site as “wider countryside” under Policy 36. It sets out a range of parameters against which development will be assessed. It states that development proposals may be supported if they are judged to be not significantly detrimental under the terms of the policy noting “Renewable energy development proposals will be assessed against Renewable Energy Policies, the non-statutory Highland Renewable Energy Strategy and where

appropriate the Onshore Wind Energy Supplementary Guidance".

A4.30 HwLDP Policy 57 – Natural, Built and Cultural Heritage requires all development proposals be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and its setting. It does acknowledge the nearby internationally important Creag Meagaidh SSSI, SAC and SPA along with Ben Alder and Aonach Beag SSSI and SAC, Wild Land Area 14 - Rannoch-Nevis-Mamores-Alder and locally important Ben Alder, Laggan and Glen Banchor Special Landscape Area.

A4.31 HwLDP Policy 67 - Renewable Energy sets out that "renewable energy development should be well related to the source of the primary renewable resource needed for operation". It states that "The Council will consider the contribution of the proposed development in meeting renewable energy targets and positive/negative effects on the local and national economy as well as all other relevant policies of the Development Plan and other relevant guidance". The Council will support proposals where it is satisfied they are located, sited and designed such as they will not be significantly detrimental overall, individually or cumulatively with other developments against eleven specified criteria (as listed in HwLDP Policy 67). Such an approach is consistent with the concept of Sustainable Design (HwLDP Policy 28) and the concept of supporting the right development in the right place at the right time.

A4.32 Policy 69 – Electricity Transmission Infrastructure states that "proposals for overground, underground or sub-sea electricity transmission infrastructure (including lines and cables, pylons/ poles and vaults, transformers, switches and other plant) will be considered having regard to their level of strategic significance in transmitting electricity from areas of generation to areas of consumption". Subject to balancing with this consideration, and taking into account any proposed mitigation measures, the Council will support proposals which are assessed as not having an unacceptable significant impact on the environment, including natural, built and cultural heritage features.

A4.33 Although HwLDP Policy 67 and Policy 69 are considered compatible with NPF4 Policy 11, NPF4 expresses greater support for renewable energy projects outwith National Parks and NSAs and requires greater weight to be attributed to the twin climate and biodiversity crises in the decision making process, whilst still recognising that a balancing exercise must still be carried out.

A4.34 The proposal is in overall conformity with the approved development plan. The proposal's expected contribution to help achieve net zero and interim climate targets accords with NPF4 Policies 1 and 11 along with HwLDP Policy 67, notwithstanding that a pump hydro scheme will use electricity from the grid (generated from whatever sources) to pump the water up, this system will help ensure energy security and resilience. Subject to consideration as to whether the proposal's avoidance and minimisation of impacts is sufficient, the proposed mitigation in terms of restoration and offsetting, with net gain in terms of soils (peat restoration), biodiversity and tree planting, in quantitative terms accord well with NPF4 Policies 3, 4, 5 and 6. The illustrated example of

community wealth building aligns with the intention of NPF4 Policy 25 and with the Council's voluntary Community Benefit policy, though the exact community benefit from this proposal cannot be confirmed until its project costs and funding arrangements are finalised. Whilst the local socio-economic benefits may be limited with only 46 full-time equivalent operational jobs anticipated dialogue between the applicant and key stakeholders in relation to support for specific projects in the local community will continue.

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

A4.35 There are no site specific or wider policies within WestPlan which are relevant to the proposed development.

Draft Energy Strategy and Just Transition Plan (2023)

A4.36 The Draft Energy Strategy and Just Transition Plan has been published for consultation. Ministers will likely give consideration to this document in their decision on the application, however, limited weight can be applied to the document given its draft status. Unsurprisingly, the material on pumped hydro storage in the document reflects in large part that contained in NPF4. A fundamental part of the Strategy is expanding the energy generation sector. Overall, the draft Energy Strategy forms part of the new policy approach alongside NPF4 and confirms the Scottish Government's policy objectives and related targets reaffirming the crucial role that pumped hydro storage and enabling transmission infrastructure will play in response to the climate crisis which is at the heart of all these policies.

Appendix 4 – Viewpoint Assessment Appraisal – Visual Impact

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
VL1 - Carn Liath summit 5.17km from the proposed development View looking South/South East	App	Medium-High	Negligible, Negligible	Negligible, Negligible	Not Significant, Not Significant	Negligible, Negligible	Negligible, Negligible	Not Significant, Not Significant
	THC	High	Negligible, Negligible	Negligible, Negligible	Not Significant, Not Significant	Negligible, Negligible	Negligible, Negligible,	Not Significant, Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	Medium-High	Low	Minor	Not Significant	Low	Minor Adverse	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor Adverse	Not Significant
	The viewpoint is a Munro summit to the north of the development, representative of views obtained from Munro summits to the north of Loch							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	Laggan. Access to this summit, along with others in the wider surrounding area including Stob Poite Coire Ardair and Creag Meagaidh, is from the Creag Meagaidh National Nature Reserve Car Park, located on the north side of the A86. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers ascending and descending the summit. The summit is marginally within Ben Alder, Laggan and Glen Banchor SLA which increases its sensitivity. It is considered the applicant has understated the sensitivity of receptors as Medium-High. It is considered that the sensiticivity of receptors should be high from this visualisation location. From the summit there are varied views, including elevated views from Carn Liath along with surrounding Munros, looking across mountainous landscape with forested glens. Loch Laggan is visible to the south-east with Stronelairg Wind Farm to the north. Lochan na h'Earba is visible in glimpsed views, partially hidden by the landforms of Binnein Shuas and Binnein Shios. From lower level sections of the route to Carn Liath summit, there is a mixture of more open views across grassland, moorland and enclosed views through patches of woodland or where passing through corries. During the construction phase activity would be seen from the summit. During operation, the Shios Dam and parts of the lower reservoir and powerhouse would be partially visible to the south east but these features would appear as relatively small within the wider mountainous landscape context and the distance of over 5km from the summit of Carn Liath would mitigate the visual impact to a certain extent. Additional planting on the eastern shore of Lochan na h'Earba around the powerhouse would provide further mitigation to the visual effect and help soften its appearance longer term.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	It is agreed that there are no cumulative effects. It is difficult to discern the details of the powerhouse and associated structures given the distance of over 5km along with the building cut into the landscape. The gabion facing is the same colour and tone of the rock cuttings which further contains the structure within the landscape. Additionally, extensive planting is proposed within the vicinity of the powerhouse and the wider site but is difficult to see in the 5 and 15 year montages. It is generally agreed with the applicant's assessment of Low or Negligible rating is appropriate with the effects considered not significant.							
VL 2 - Beinn a' Chaorainn summit 8.06km from the proposed development View looking	App	High	Negligible, Negligible	Negligible, Negligible	Not Significant, Not Significant	Negligible, Negligible	Negligible, Negligible	Not Significant
	THC	High	Negligible, Negligible	Negligible, Negligible	Not Significant, Not Significant	Negligible, Negligible	Negligible, Negligible	Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
East/South East	App	High	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low	Minor	Not Significant	Low	Minor Adverse	Not Significant
	The viewpoint is a Munro summit to the north west of the development representative of views obtained from Munro summits to the north of Loch Laggan such as this along with Beinn Teallach. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers ascending and descending the summit. The summit is outwith the Ben Alder, Laggan and Glen Banchor SLA which increases its sensitivity. It is agreed the sensitivity is High. From the summit there are varied views, including elevated views, looking across mountainous landscape with glens and waterbodies visible at lower elevation. Loch Laggan is visible to the east and areas of forestry to the south. During the construction phase activity would be seen from the summit. During operation, the Leamhain and Shuas dams would be partially visible to the south east along with new tracks. Again, these features would appear as relatively small within the wider mountainous landscape context and the distance of over 8km from the summit of Beinn a' Chaorainn would mitigate the visual impact to a certain extent. Whilst the visualisation for year 15 of operation shows a vegetated front face of the Shuas Dam and mitigation planting near the base of the							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	dam which would further reduce its perceptibility the colour matching for the south western face of the dam appears optimistic. Additionally, the draw down colouration does not appear to be consistent from image to image. The applicant noted that the change in colour is intended to depict erosion, it will start off as brown as the initial vegetation is lost and the peat/topsoil remains (shown in the year 1 montage). This will then be washed out to leave a more eroded stoney shoreline in the year 5 and 15 montages with the applicant using photographs of other developments to inform these colour. The tree planting above the loch level could have a more natural relationship to the hillside when viewed from this summit. It appears to spread across the slope, but not horizontally, or responding to any obvious influence within the landscape. The planting layout would be improved if it followed the arrangement of lower level trees with fingers of vegetation running up the slope. On closer scrutiny, the planting is shown following the track line rather than any line of force in the landscape. This appears to be a “screening driven” approach rather than a genuine landscape enhancement for Biodiversity Net Gain. It is considered both objectives could be achieved with slightly more extensive planting that follows the landform rather than the track. This can be controlled be a condition requiring the submission of a finalised planting plan. The applicant noted these comments regarding how the detailed design of the planting could be improved and they will be incorporated into the final planting plan should the application be grated consent. It is agreed there are no cumulative effects. It is generally agreed with the applicant’s assessment of Low or Negligible rating is appropriate with the effects considered not significant.							
VL3 – Carn Dearg	App	Medium-High	Low-Medium,	Moderate, Moderate	**Significant, Significant**	Low-Medium,	Moderate, Moderate	**Significant, Significant**

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
summit 2.49km from the proposed development View looking North			Low-Medium			Low-Medium		
	THC	High	High, High	Major, Major	**Significant, Significant**	High, High	Major, Major	**Significant, Significant**
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	Medium-High	Medium	Moderate	**Significant**	Medium	Moderate	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	The viewpoint is a Munro summit to the south of the development within both WLA 14 Rannoch-Nevis-Mamore-Alder Wild Land Area and Ben Alder, Laggan and Glen Banchor SLA. This is representative of views of the upper reservoir from this and other Munro summits such as Geal Chàrn, Aonach Beag and Beinn Eibhinn. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers ascending and descending the summit. The summit is within both the WLA and SLA which increases its sensitivity. Receptors will be hill walkers ascending and descending the summit. The summit is marginally within Ben Alder, Laggan and Glen Banchor SLA which increases its sensitivity. It is considered the applicant has understated the sensitivity of receptors as Medium-High. It is considered that the sensiticivity of receptors should be high from this visualisation location.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	From Carn Dearg summit there are panoramic views across surrounding glens and mountain summits, with Loch Pattack notable to the north east, Loch Ericht to the east and Loch Leamhain to the north. From this viewpoint the construction phase will be particularly noticeable and distracting where visible. There will be various elements of activity around Loch Leamhain for the construction of the Leamhain Dam, upper intake, construction and use of associated tracks, compound areas and borrow pits. This would form a concentrated area of works experienced from Carn Dearg along with surrounding slopes. The applicant considers the effect during construction would be Moderate Adverse (Significant) in the localised surrounding area extending as far as Carn Dearg. It is considered that they have understated the effects from this view with a High magnitude of change creating a Major Adverse (Significant) given the major works required. After construction the upper reservoir would generally appear relatively contained by the surrounding landform and experienced mainly from higher slopes. The increased size of the loch would not appear out of keeping within a landform where lochs and lochans are common features. However, the linear form of the dam and visible drawdown area would increase the influence of manmade features within the view and contrast with the surrounding hills which may diminish the sense of naturalness and wildness from this view. Whilst existing tracks are already present within the wider area new access tracks associated with the development would be seen in the view. As noted, these impacts can be minimised by reducing widths of tracks once operational. The applicant considers there will be a localised Moderate Adverse (Significant) effect during both year 1 and year 15 of operation within the area surrounding the upper reservoir and north, facing slopes to the south of the Leamhain Dam. However, given the localised nature of effects, the applicant considers the overall effect Moderate Adverse (Not Significant) during operation. It is considered that they have							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	understated the effects from this view. Due to the scale and form of the Leamhain Dam, draw-down zone, fluctuating water levels the presence of associated infrastructure, the assessment of Low-Medium magnitude of change after the construction period is not considered appropriate. The dam and increased water body will remain obviously constructed artefacts in this view from Carn Dearg with the broad draw down zone revealing not only the natural rock landform but areas which have been excavated for borrowpits along with the upstream face of the dam. The fluctuation of water levels in itself would also have an impact. Therefore, it is considered to be a High magnitude of change. The development, particularly the dam structures and extensive draw down zone, would be dominant features from this localised viewpoint at considerable variance within the landscape landform scale and pattern. As such, it is considered a Major Adverse (Significant) effect. Whilst this is a higher level of adverse effect than identified within the LVIA the applicant conceded that there would still be a Significant effect extending to the summit of Carn Dearg. Along the ridgeline and summit area of Càrn Dearg the proposed Corrievarkie pumped hydro storage scheme (currently at Scoping stage) is not anticipated to lead to a change to the baseline at VL3 - Carn Dearg would result in any greater effect. Two developments were identified for inclusion within the cumulative assessment. The proposed Corrievarkie Pumped Storage Scheme at the southern end of Loch Ericht. This is currently at Scoping stage (21/03366/SCOP) and is therefore assessed as a theoretical development with no fixed design. The other is the replacement weir and change to inundation levels on Loch Ossian consented in November 2022 (21/03981/FUL). As with Viewpoint 2, the applicant noted that the change in colour between year 1, 5 and 15 montages is intended to depict the loss of soil/peat in the drawdown zone over time. Additionally, there will also be a slight greening/weathering of the dam face over time.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
VL4 – Creag Pitridh summit 1.8km from the proposed development View looking North	App	High	Low-Medium, Low	Minor-Moderate, Minor	Not Significant, Not Significant	Low-Medium, Low	Minor-Moderate, Minor	Not Significant, Not Significant
	THC	High	Medium, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant	High, Low-Medium	Major, Minor-Moderate	**Significant**, Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	High	High	Moderate-Major	**Significant**	High	Moderate-Major Adverse	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	The viewpoint is a Munro between the upper and lower lochs of the development representative of views of the lower reservoir from this and other summits such as Beinn a ' Chlachair, Geal Charn along the circular recreational route from the A86 connecting these three Munros. An additional visualisation during the construction phase has also been provided for VL4. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	Receptors will be hill walkers ascending and descending the summit. The summit is within both the WLA and SLA which increases its sensitivity. It is agreed the sensitivity is High. From Creag Pitridh there are expansive views across Lochan na h -Earba and Loch Laggan to the north and north west with views of the forested valley floor traversed by the River Spean to the west and south west. Construction works and activity associated with the proposed development would be very noticeable from this summit. Additionally, there would be intervisibility with construction works at the northern part of the lower reservoir from Creag Pitridh. Such activities will interrupt the remote character and sense of wildness in the view where there is currently relatively limited human intervention. The applicant considers the effect during construction would be Moderate – Major Adverse (Significant). The current view of the distinctive characteristic of the twin lochs will change with them merging into one loch with the addition of promontories projecting from either shoreline. During operation the Shios Dam, northern part of the lower reservoir along with new tracks and drawdown would be seen from this summit. Mitigation measures including reinstatement, particularly around access tracks and planting within the surrounding area will help to reduce visual effects to some extent. The applicant considers that whilst it is not considered that the longer-term effect to the visual amenity of this summit would be significantly adverse as expansive elevated upland and mountain views would still be experienced from the outlook of Creag Pitridh. They consider that the magnitude of change will reduce to Low-Medium and Low in year 1 and year 15 of operation with the effects not significant.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	It is agreed there are no cumulative effects. It is considered that the applicant has understated the visual impact at the early operational stage before mitigation measures along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change reduces slightly but would remain Medium for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. This would taper off as the years passed to Low-Medium and Minor-Moderate Adverse (not significant) in year 15. When queried if the drawdown area has been understated in the montage images the applicant acknowledged that the drawdown area slightly less grey than some of the other montages used for other viewpoints. However, they consider the visualisations are an accurate depiction of drawdown at the half way point as described in the methodology and note the gradient of the slopes around Loch Earba which results in limited horizontal drawdown. When noting that the initial photo image appears to have a slight haze the applicant accepted there was a sharp focus of the rocks in the foreground considered the “softness” of the image was a result of light conditions on the day. They reiterated that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance, however when taking photographs from mountain summits some haze is often unavoidable.							
VL5 – Beinn a’ Chlachair summit	App	High	Low-Medium, Low	Minor-Moderate, Minor	Not Significant, Not Significant	Low-Medium, Low	Minor-Moderate, Minor	Not Significant, Not Significant

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
2.76km from the proposed development View looking north	THC	High	Medium, Low-Medium	Major, Minor-Moderate	**Significant**, Not Significant	High, Low-Medium	Major, Minor-Moderate	**Significant**, Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	High	High	Moderate-Major	**Significant**	High	Moderate-Major Adverse	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	As for VL4 previously this is another Munro summit to the south of the development representative of views of the lower reservoir from this and other summits such as this, Creag Pitridh and Geal Charn along the circular recreational route from the A86 connecting these three Munros. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers ascending and descending the summit. The summit is within both the WLA and SLA which increases its sensitivity. It is agreed the sensitivity is High.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	From Beinn a' Chlachair there are expansive views across Lochan na h -Earba and Loch Laggan to the north and north west with views of the forested valley floor traversed by the River Spean to the west and south west. Construction works and activity associated with the proposed development would be very noticeable from this summit. Additionally, there would be intervisibility with construction works at the the Shuas Dam and southern lower reservoir would be seen from northern parts of the Beinn a' Chlachair summit. The Leamhain Dam and upper reservoir would also be seen briefly seen on the descent from this summit towards Bealach Leamhain. Such activities will interrupt the remote character and sense of wildness in the view where there is currently relatively limited human intervention. The applicant considers the effect during construction would be Moderate – Major Adverse (Significant). During operation the Shuas Dam and southern lower reservoir along with new tracks and drawdown would be seen from this summit. Mitigation measures including reinstatement, particularly around access tracks and planting within the surrounding area will help to reduce visual effects to some extent. The applicant considers that the longer-term effect to the visual amenity of this summit would not be significantly adverse as expansive elevated upland and mountain views would still be experienced from the outlook of Beinn a' Chlachair. They consider that the magnitude of change will reduce to Low-Medium and Low in year 1 and year 15 of operation with the effects not significant. It is agreed there are no cumulative effects. It is considered that the applicant has understated the visual impact at the early operational stage before mitigation measures along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change would reduce							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	slightly but would remain Medium for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. This would taper off as the years passed to Low-Medium and Minor-Moderate Adverse (not significant) in year 15. As with VL4, the initial photo image appears to have a slight haze but the applicant advised this was a result of light conditions on the day. They reiterated that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance, however when taking photographs from mountain summits some haze is often unavoidable. There is some concern that the outer face of the dam does not emulate the surrounding landform and appears jarring from this view. The applicant notes that the dam was considered in detail at the planning design stage with the slope proposed at a much more reduced angle than is typical for an embankment dam which allows for turfs to succeed on the structure and will merge into the hillside more subtly than shown on the visualisations. They note that the dam is subject to the Reservoirs Act and providing landscape features on the dam face or large trees is not allowed.							
VL6 - Proposed access track to North East of Lochan na	App	High	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant**, Not Significant	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant**, Not Significant
	THC	High	Medium-High, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant	Medium-High, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
h-Earba 2.47km from the proposed development View looking South West		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	High	High	Major	**Significant**	High	Major	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	The viewpoint is representative of lower level views from within the glen of the proposed lower reservoir from the access track along the shore of Loch Earba which is located within both the WLA and SLA. The track follows the eastern shore of Loch Earba then loops around the northern loch. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be a mixture of hill walkers, recreational walkers and cyclists. The site is within both the WLA and SLA which increases its sensitivity. It is agreed the sensitivity is High. From the track there will be channelled, long-distance views along the scenic, distinctive U-shaped glen. The view extends across both lochs, as well as up valley slopes to surrounding mountain summits with the rock face of Binnean Shuas a particular focal point within the view. At the northern end of the track, views feature scattered trees on valley slopes, including small clumps down to the loch edge. Built features associated with a hydro scheme are also visible including and intake and weir at the northern end of the lochs and weir and river channelling							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	works between the two lochs. There would be views of construction activity in close proximity from this track, including at borrow pits, compounds, the Shios and Shuas Dams, new tracks (including the track on western side of loch), powerhouse, adit, promontories and drawdown. Whilst recreational users of this track would be directed along the new track on the opposite side of the loch works would still be prominent along the full length. The applicant considers the magnitude of change is High and the effect during construction would be Major Adverse (Significant). This is agreed. Once operational, the track would be inundated and rerouted along higher ground up the slope set further back from the loch. There would continue to be views of the dams at either end of the reservoir and the fluctuating extent of drawdown may appear distracting. Whilst hidden from this viewpoint and concealed more generally along the track the powerhouse and surrounding landform would also form a notable new feature and would interrupt some views along the valley in the wider surrounding area. The new estate track on the west side of the loch will also be perceptible. Over time, planting would filter and soften views of the drawdown and powerhouse area. The applicant considers the creation of the promontories either side of the loch would go some way to re-establishing the separation of the two lochs and with planting, would give similar visual combinations of open water and trees contained by the craggy valley sides when looking along the valley. From this viewpoint the forms of the promontories appear artificial. If it were developed with less of a flat topped form and appear as more of a knoll it would screen more of the dam at the outset and lend a more interesting landform to the tree planting as it became establshed. The applicant agrees that more can be done to create a naturalistic form that would enhance the appearance of the development, particularly the promontory on the south east shore side, and the design can be improved. if it were developed to have a less flat topped form and be more							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	of a knoll, it would screen more of the dam at the outset and lend a more interesting form to the tree planting as it developed. Proposed planting would change the visual experience of this route over time, potentially leading to greater enclosure. However, whilst different, this would not necessarily be a negative change and would not increase the level of effect. This is agreed. In year 1 of operation the applicant considered there would be a Medium magnitude of change leading to a Moderate Adverse (Significant) effect. It is considered that the applicant has understated the visual impact at the early operational stage before the promontories along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change would remain Medium-High for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. Whilst this is a higher level of adverse effect than identified within the LVIA the applicant conceded that there would still be a Significant effect. In year 15 of operation the applicant considered there would be a Low-Medium magnitude of change leading to a Minor-Moderate Adverse (not significant) effect. This is generally agreed. Whilst even in year 15 of operation the fluctuation of water levels in itself will continue to have some visual impact with the maximum drawdown of approximately 22m along the banks of Loch Earba mitigation measures will have become embedded within the landscape. As such, the drawdown, along with the dam structures, would be a less influential features from this localised viewpoint.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	It is agreed there are no cumulative effects. As with other viewpoints, the initial photo image appears to have a soft focus. The applicant reiterated that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance.							
VL7 - Proposed access track to south-east of Lochan na h-Earba 0.52 km from the proposed development View looking North East	App	High	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant**, Not Significant	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant**, Not Significant
	THC	High	Medium-High, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant	Medium-High, Medium	Major, Minor-Moderate	**Significant,** Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	High	High	Major	**Significant**	High	Major	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	The viewpoint is representative of lower level views from within the glen of the proposed lower reservoir from the access track along the shore of Loch Earba wich is located within both the WLA and SLA. The track follows the eastern shore of Loch Earba then loops around the							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	northern loch. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be a mixture of hill walkers, recreational walkers and cyclists. The site is within both the WLA and SLA which increases its sensitivity. It is agreed the sensitivity is High. From the track there will be channelled, long-distance views along the scenic, distinctive U-shaped glen. The view extends across both lochs, as well as up valley slopes to surrounding mountain summits with the rock face of Binnean Shuas a particular focal point within the view. At the northern end of the track, views feature scattered trees on valley slopes, including small clumps down to the loch edge. Built features associated with a hydro scheme are also visible including and intake and weir at the northern end of the lochs and weir and river channelling works between the two lochs. There would be views of construction activity in close proximity from this track, including at borrow pits, compounds, the Shios and Shuas Dams, new tracks (including the track on western side of loch), powerhouse, adit, promontories and drawdown. Whilst recreational users of this track would be directed along the new track on the opposite side of the loch works would still be prominent along the full length. The applicant considers the magnitude of change is High and the effect during construction would be Major Adverse (Significant). This is agreed.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	Once operational, the track would be inundated and rerouted along higher ground up the slope set further back from the loch. There would continue to be views of the dams at either end of the reservoir and the fluctuating extent of drawdown may appear distracting. Whilst hidden from this viewpoint and concealed more generally along the track the powerhouse and surrounding landform would also form a notable new feature and would interrupt some views along the valley in the wider surrounding area. The new estate track on the west side of the loch will also be perceptible. Over time, planting would filter and soften views of the drawdown and powerhouse area. The applicant considers the creation of the promontories either side of the loch would go some way to re-establishing the separation of the two lochs and with planting, would give similar visual combinations of open water and trees contained by the craggy valley sides when looking along the valley. From this viewpoint the forms of the promontories appear artificial, only a small portion of the promontory extending from the south east shore side can be seen from this viewpoint. If they were developed with less of a flat-topped form and appear as more of a knoll it would screen more of the dam at the outset and lend a more interesting landform to the tree planting as it bbecomes established. The applicant agrees that more can be done to create a naturalistic form that would enhance the appearance of the development, and the design can be improved. if it were developed to have a less flat-topped form and be more of a knoll, it would screen more of the dam at the outset and lend a more interesting form to the tree planting as it developed. Proposed planting would change the visual experience of this route over time, potentially leading to greater enclosure. However, whilst different, this would not necessarily be a negative change and would not increase the level of effect. This is agreed and the visualisations show that the tree cover can work to good effect along this section of track.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	In year 1 of operation the applicant considered there would be a Medium magnitude of change leading to a Moderate Adverse (Significant) effect. It is considered that the applicant has understated the visual impact at the early operational stage before the promontories along with vegetation and planting have had time to become embedded within the view. It is considered that the magnitude of change would remain Medium-High for the early years of the proposed development becoming operational with continued Major Adverse (Significant) effects in year 1. Whilst this is a higher level of adverse effect than identified within the LVIA the applicant conceded that there would still be a Significant effect. In year 15 of operation the applicant considered there would be a Low-Medium magnitude of change leading to a Minor-Moderate Adverse (not significant) effect. This is generally agreed. Whilst even in year 15 of operation the fluctuation of water levels in itself will continue to have some visual impact with the maximum drawdown of approximately 22m along the banks of Loch Earba mitigation measures will have become embedded within the landscape. As such, the drawdown, along with the dam structures, would be a less influential features from this localised viewpoint. It is agreed there are no cumulative effects. As with other viewpoints, there is come differentiation regarding colouring shown the visualisations as the drawdown zone is shown as darkening existing vegetation in the year 1 image but the same darkening does not continue around the constructed landform which makes it difficult to discern the forms. The applicant concedes that there is a minor error in the rendering of the drawdown area which appears to break momentarily.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
VL8 – West of Loch a' Bhealaich Leamhain 1.04km from the proposed development View looking East/South East	App	High	Medium-High, Medium-High	Moderate, Moderate	**Significant, Significant**	Medium-High, Medium-High	Moderate, Moderate	**Significant**
	THC	High	High, High	Major, Major	**Significant, Significant**	High, High	High, High	**Significant**
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	High	High	Major	**Significant**	High	Major	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	The viewpoint is representative of upland views from the stalkers path over Bealach Leamhain and the visual effects on Loch Leamhain within both the WLA and SLA. The stalkers path is accessed from Loch Earba through Coire Pitridh for approximately 3.5km to the highest point. The viewpoint is located on a prominent area of bedrock next to the path above Loch a Bhealaich. The path is part of the wider route between Beinn a' Chlachair and Creag Pitridh linking the nearby 3 Munros. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	Receptors will be hill walkers. The site is within both the WLA and SLA which increases its sensitivity. It is agreed the sensitivity is High. From this viewpoint there are elevated long-distance but focussed views to the south across Loch a' Bhealach Leamhain, Loch Pattack and wider landscape including rugged mountains and in the distance, areas of coniferous forestry. Travelling north, views are more contained, especially around Loch a' Bhealach Leamhain. During construction, there would be views of extensive construction activity within the upper reservoir area and at the Leamhain Dam at close proximity from the sections of route around Loch a' Bhealaich Leamhain. Views of construction works for the Leamhain Dam would also be prominent when ascending the route from Loch Pattack. Parts of this route would also be widened and used for construction traffic. During operation, there would continue to be views of the Leamhain Dam, upper reservoir and associated drawdown, new tracks (which would be reduced in width after construction period) and access to the gate gallery. Parts of the route would be inundated but would be re-constructed at a higher level. From the lower part of the route towards Loch Pattack, the dam would be prominent, but would screen other features around the reservoir from view. During the construction period the applicant considers the magnitude of change will be High with a Major Adverse (Significant) effect. This is agreed. They consider that the magnitude of change will reduce to Medium-High in year 1 and year 15 of operation with Moderate Adverse (Significant) effects. It is considered they have understated the visual impact longer term. Even in year 15, the development, particularly the significant Leamahin Dam structure, extensive draw down zone, associated tracks and other infrastructure would be influential features from this localised viewpoint. As such, it is considered a Major Adverse (Significant) effect will extend well into the lifespan of the proposed							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	development from localised views. Whilst this is a higher level of adverse effect than identified within the LVIA the applicant conceded that there would still be a Significant effect extending around Loch a' Bhealaich Leamhain. It is agreed there are no cumulative effects. It was noted that the inner face of the dam is to be an asphalt finish, however, the visualisations show this matching closely to the tone and colours of existing vegetation which may be overly optimistic. This was queried with the applicant who responded noting there will be considerable peat staining, which will initially match the drawdown zone before the drawdown area develops into a stonier appearance with water levels rising and falling over time. Additionally, they noted the inner face of the dam will be either asphalt or concrete with concrete has been depicted in the visualisations.							
VL9 – Binnein Shuas, near summit 1.12km from the proposed development	App	Medium-High	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant,** Not Significant	Medium, Low-Medium	Moderate, Minor-Moderate	**Significant**, Not Significant
	THC	High	High, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant	High, Low-Medium	Major, Minor-Moderate	**Significant,** Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
View looking South East	App	Medium-High	High	Moderate-Major	**Significant**	High	Moderate-Major	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	This view is representative of the top of the Ardverikie Wall crag showing the setting of the proposed powerhouse within the landscape. The summit is accessed by either the steeper route which requires a technical rock climb of the Ardverikie Wall crag or up the westerly slopes without climbing the crag. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers, rock climbers and ice climbers. The site is within both the WLA (marginally) and SLA which increases its sensitivity. It is considered the applicant has understated the sensitivity of receptors as Medium-High. It is considered that the sensitivity of receptors should be high from this visualisation location. From this viewpoint the outlook is towards Loch Earba and its southern shore, over moorland and forestry to the south. From the climbing crags there are extensive views south east over Lochan na h -Earba looking over towards Creag Pitridh on the other side of the loch. From the summit of Binnein Shuas there are views north west towards Loch Laggan. Views north east feature both Loch Laggan and Loch Earba along with the ridgeline that separates them and the summit of Binnein Shios. To the south/south west there are views across the valley floor							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	featuring moorland and forestry, looking towards distant mountains. Construction around the lower reservoir would be very noticeable including the Shuas and Shios Dams, tracks, powerhouse, promontories construction compounds and borrow pits. Works at the surge shafts would also be noticeable from more elevated parts of the route. During operation there would be noticeable views overlooking the powerhouse area, Shuas Dam and across the wider reservoir. Built features at the surge shaft would also be perceptible from high ground. However, these features would be likely to be less distracting without the activities of construction works. Over time, the applicant considers that landscape mitigation tree planting would soften the appearance of some of these features, particularly the powerhouse with the wider vista of surrounding mountains likely to remain the greater focus of the view from receptors at and travelling to Binnein Shuas summit. During the construction period the applicant considers the magnitude of change will be High with a Moderate-Major Adverse (Significant) effect. It is considered they have understated the visual impacts during construction. Additionally, hey consider that the magnitude of change will reduce to Medium in year 1 with a Moderate Adverse (Significant) effect reducing to Low-Medium in year 15 of operation with a Minor-Moderate (Not Significant) effect. In year 15 of operation the applicant considered there would be a Low-Medium magnitude of change leading to a Minor-Moderate Adverse (not significant) effect. This is generally agreed. Whilst even in year 15 of operation the fluctuation of water levels in itself will continue to have some visual impact with the maximum drawdown of approximately 22m along the banks of Loch Earba mitigation measures will have become embedded within the landscape. As such, the drawdown, along with the dam structures, powerhouse and associated tracks, would							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	be a less influential features from this localised viewpoint. It is agreed there are no cumulative effects. It is considered that the relationship of the control building to the surrounding landscape works relatively well and l less conflicting than that of the dams generally, partly given the nature of the structures and the mitigations measures available. It is noted that more variation within the top line of the gabion wall would help the powerhouse more successfully meet the design concept of making the structure recessive within the landscape. Installing breaks within the topline would better reflect the exposed rock on the slope to the rear of the powerhouse. Additionally, tree planting within the roofscape would further break up the form. The applicant welcomed these comments which will be used to further develop the detailed design of the powerhouse at the application stage and controlled by condition.							
VL10 – Track to Loch Pattack 4.61km from the proposed	App	Medium-High	Low-Medium, Low-Medium	Moderate, Moderate	**Significant, Significant**	Low-Medium, Low-Medium	Moderate, Moderate	**Significant, Significant**
	THC	High	High, High	Major, Major	**Significant, Significant**	High, High	Major, Major	**Significant, Significant**
		During construction	During	During	During	During	During	During construction

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
development			construction	construction	construction	construction	construction	
View looking West	App	Medium-High	Medium	Moderate	**Significant**	Medium	Moderate	**Significant**
	THC	High	High	Major	**Significant**	High	Major	**Significant**
	This view is representative of the outlook from the track towards Loch Pattack where westerly views open up across open moorland and the loch towards surrounding hills. The track is part of a wider route linking the Carn Dearg, GealCharn, Aonach Beag and Beinn Eibhinn Munros. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. Receptors will be hill walkers ascending and descending the summits of the surrounding Munros along with recreational walkers and cyclists around Loch Pattack. The summit is within the WLA which increases its sensitivity. It is considered the applicant has understated the sensitivity of receptors as Medium-High. It is considered that the sensitivity of receptors should be High from this visualisation location. From this viewpoint the construction phase will be particularly noticeable and distracting where visible. There will be various elements of activity viewed from the Pattack valley and shore of Loch Pattack for the construction of Leamhain Dam and associated access tracks. During the construction period the applicant considers the magnitude of change will be Medium with a Moderate Adverse (Significant) effect.							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	It is considered they have understated the visual impacts during construction. Additionally, they consider that the magnitude of change will reduce to Low-Medium in year 1 and year 15 with Moderate Adverse (Significant) effects. There will be significant activity during the construction period in views in and around Loch Pattack with Leamhain Dam an influential feature from this localised viewpoint in the longer term. As such, it is considered that the magnitude of change will remain High with Major Adverse (Significant) effects at the construction phase and extending well into the lifespan of the proposed development from localised views. Whilst this is a higher level of adverse effect than identified within the LVIA the applicant conceded that there would still be Significant effects from this viewpoint. In the wider surrounding area, the proposed Corrievarkie pumped hydro storage scheme (currently at Scoping stage) may be seen but is not anticipated to lead to a change to the baseline at VL10 – Track to Loch Pattack would result in any greater effect. As with other viewpoints, there is some concern as to whether the visualisation provided a realistic interpretation of how Leamhain Dam will from around Loch Pattack. The applicant noted that dappled lighting caused by the cloud cover might be one reason it was considered unrepresentative and reiterated that all photography has been undertaken in compliance with the requirements of both Highland Council and NatureScot guidance.							
VL11 – Gael Charn summit	App	Medium-High	Low, Low	Minor, Minor	Not Significant, Not Significant	Low, Low	Minor, Minor	Not Significant, Not Significant

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
8.93km from the proposed development View looking West	THC	High	Low-Medium, Low-Medium	Minor-Moderate, Minor-Moderate	Not Significant, Not Significant	Low-Medium, Low-Medium	Minor-Moderate, Minor-Moderate	Not Significant, Not Significant
		During construction	During construction	During construction	During construction	During construction	During construction	During construction
	App	Medium-High	Low	Minor	Not Significant	Low	Minor	Not Significant
	THC	High	Low-Medium	Minor-Moderate	Not Significant	Low	Minor-Moderate	Not Significant
	This view is representative of the outlook from the Gael Charn Munro summit on the fringe of Cairngorm National Park where elevated westerly views of the mountains along Loch Ericht. It is similar to viewpoint VL10 but at a higher elevation. The summit can be reached along with A' Mharconaich on the wider route heading off from the A9 at Balsporran Bed and Breakfast. The baseline is as described in Section 7.6 Landscape and 7.7 Visual of the EIAR Volume 1: Chapter 7 Landscape of Visual. From this viewpoint there are panoramic views towards distant hills with Loch Ericht in the foreground of views west and Loch Pattack further in the distance. Receptors will be hill walkers ascending and descending the summits of Gael Charn and surrounding Munros. It is							

			Proposed Development			Cumulative		
Viewpoint	App / THC	Sensitivity of the Receptor the Receptor (Susceptibility / value of the view) High, Medium, Low, Negligible	Magnitude of change (Scale of Change / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year15)	Magnitude of Cumaltive Change (Scale / Extent / Duration) (Year 1, Year 15) High, Medium, Low, Negligible	Level of Effect (Magnitude of Change / Sensitivity of Receptor) (Year 1, Year 15) High, Medium, Low, Negligible	Significance (Major and Major-Moderate are Significant. Moderate may be significant) (Year 1, Year 15)
	considered the applicant has understated the sensitivity of receptors as Medium-High. It is considered that the sensitivity of receptors should be High from this visualisation location. Construction works, Leamhain Dam and tracks would feature in the corrie above Loch Pattack in views west. The applicant considers the magnitude of change will be Low with a Minor Adverse (Not Significant) effect. Whilst it is considered that this is marginally understated it is generally agreed that the effects will not be significant given the distance of over 8km from this viewpoint and the proposed development would occupy a relatively small portion of the overall wide and panoramic landform. In the wider surrounding area, the proposed Corrievarkie pumped hydro storage scheme (currently at Scoping stage) may be seen but is not anticipated to lead to a change to the baseline at VL11 – Gael Charn summit would result in any greater effect. Again, as with viewpoint VL10 Leamhain Dam appears faint in the visualisations provided. The applicant noted that given the surrounding scree slopes it was felt the rock face, when allowed to become vegetated over time it would provide the best finish in the wider setting. They consider the visualisations help to demonstrate this.							

North

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Plan
1:50,000 @ A3

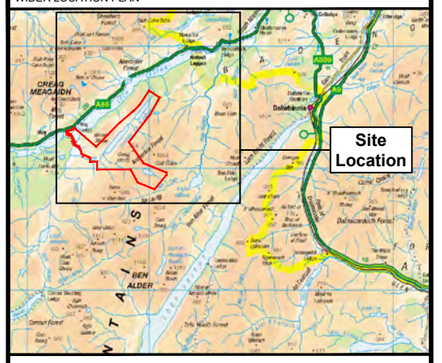
0 1.25km 2.5km

IF IN DOUBT - ASK

LEGEND

Planning Boundary

WIDER LOCATION PLAN



REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MH	FOR PLANNING	DT	GMcG

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A GILKES ENERGY COMPANY

PROJECT

PROPOSED
EARBA PSH

TITLE

LOCATION PLAN
FIGURE 2.1

SIZE	SCALE AT A3	STATUS
A3	1:50,000	PLANNING

DRAWING NUMBER: EAR/GEL/001
REVISION: P1

North

SHIOS DAM
SC6A
SC6B
BP4
SC5
BP3
PROMONTORIES
SC1
BP1
LOWER CONTROL WORKS
POWERHOUSE
SURGE SHAFTS
SHUAS DAM
SC3
SC7
SC2B
SC2A
SHUAS AQUEDUCT
UPPER CONTROL WORKS
PITRIDH ADIT
MAIN SITE COMPOUND
PITRIDH AQUEDUCT
SC8
BP5B
BP5A
LEAMHAIN DAM

Plan
1:30,000 @ A3

IF IN DOUBT - ASK

LEGEND

- Planning Boundary
- Inundation
- Dam
- Intake
- Surge Shaft
- Adit
- Shios Valve House and Fish Pool
- Leamhain Upper Gate House
- Leamhain Lower Valve House
- Tunnel
- Powerhouse
- Borrow Pit
- Compound
- Promontories
- Aqueduct / Diversion Channel
- Access Bridge
- PSH Track
- Estate Track / Footpath
- Leamhain Dam Spillway
- Loch a' Bhealaich Leamhain Proposed to be Drawn Down to +612m During Construction
- New Tree Planting - Riparian Mix
- New Tree Planting - Upland Mix

0 500m 1000m

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.23	MH	FOR PLANNING	DT	GMcG

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TITLE
SCHEME ARRANGEMENT FIGURE 2.2

SIZE	SCALE AT A3	STATUS
A3	1:30,000	PLANNING

DRAWING NUMBER: EAR/GEL/002
REVISION: P1

North

Isolation Gates

Upper Control Works

SC8

640m

710m

BP5B

SC8

640m

BP5A

710m

Leamhain Dam

Spillway

Dam bottom outlet control structure to deliver residual flows and freshets to maintain existing flow profile in the burn downstream of the dam

Plan
1:10,000 @ A3

0 250m 500m

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

LEGEND

- +710m Maximum Inundation Level
- +640m Minimum Water Level
- Dam Footprint
- Tunnel
- Intake
- Isolation Gate House
- PSH Track
- Estate Track / Footpath
- Borrow Pit
- Compound (SC8)

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.23	MH	FOR PLANNING	DT	GMcG

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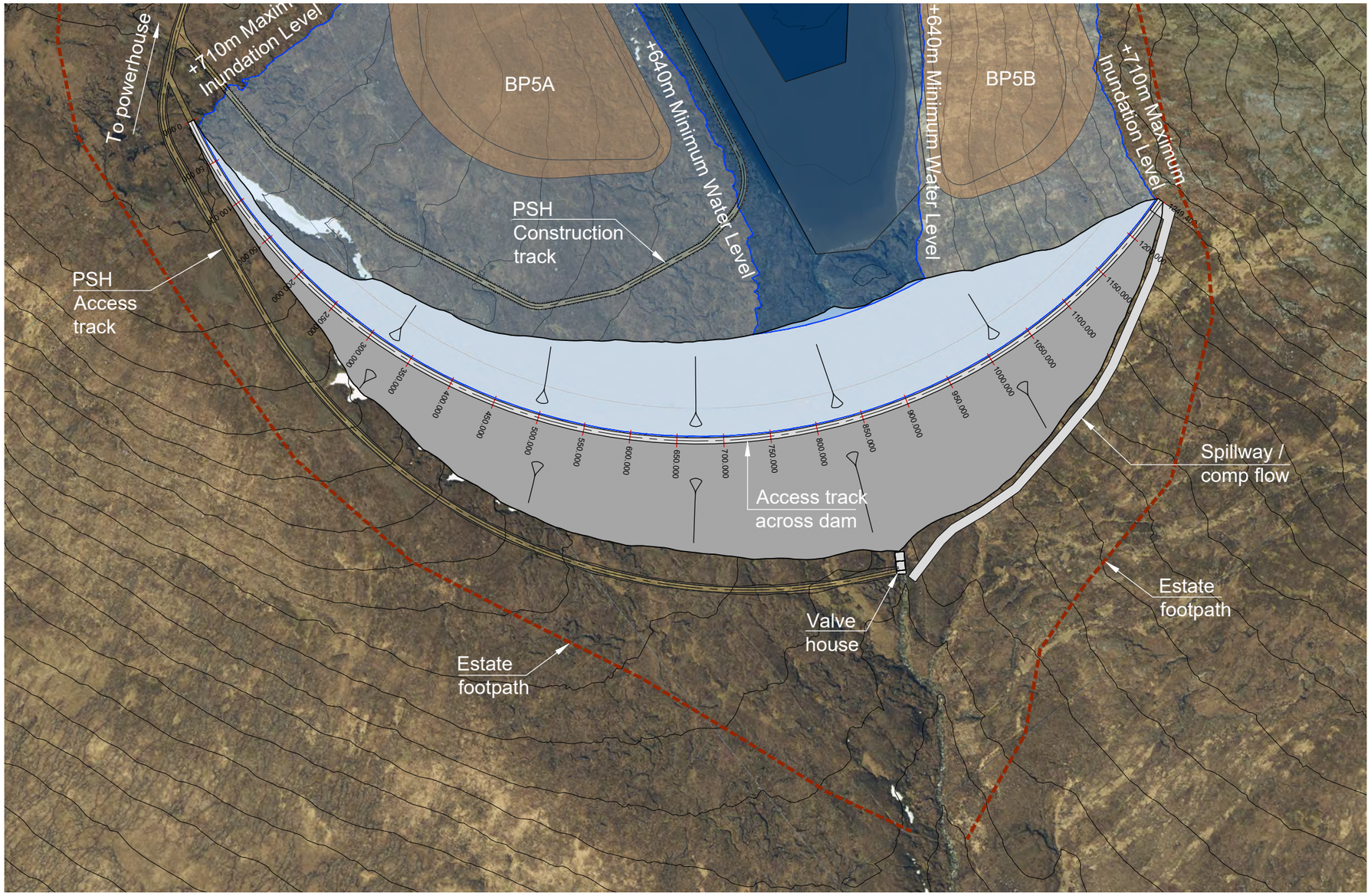
TITLE
UPPER LEAMHAIN RESERVOIR
PLAN VIEW
FIGURE 2.4

SIZE	SCALE AT A3	STATUS
A3	1:10,000	PLANNING

DRAWING NUMBER: EAR/GEL/301
REVISION: P1

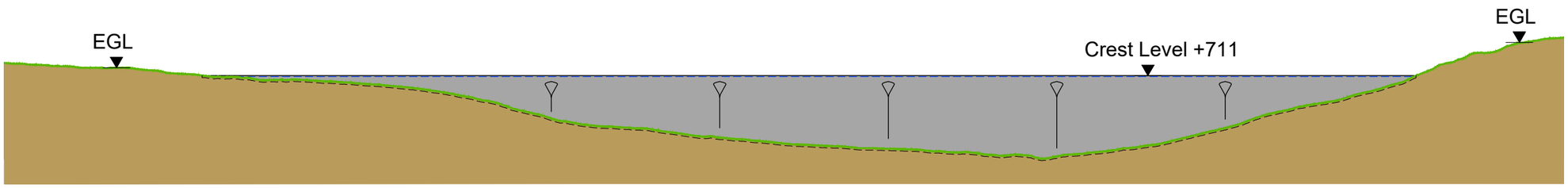
North



Plan

1:5000 @ A3

0 125m 250m



0 125m 250m

Downstream Elevation

1:5000 @ A3

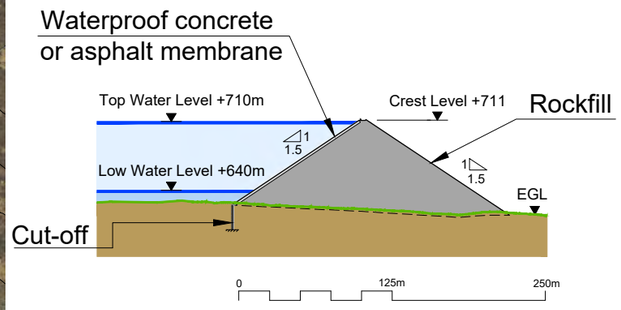
IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

LEGEND

- +710m Maximum Inundation Level
- +640m Minimum Water Level
- Dam Footprint
- Estate Track / Footpath
- Borrow Pit
- Compound



Dam Cross Section

Horiz. 1:5000, Vert. 1:5000 @ A3

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MH	FOR PLANNING	DT	GMcG

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TITLE

LEAMHAIN DAM
GENERAL ARRANGEMENT
FIGURE 2.5

SIZE	SCALE AT A3	STATUS
A3	1:5000	PLANNING

DRAWING NUMBER: EAR/GEL/302

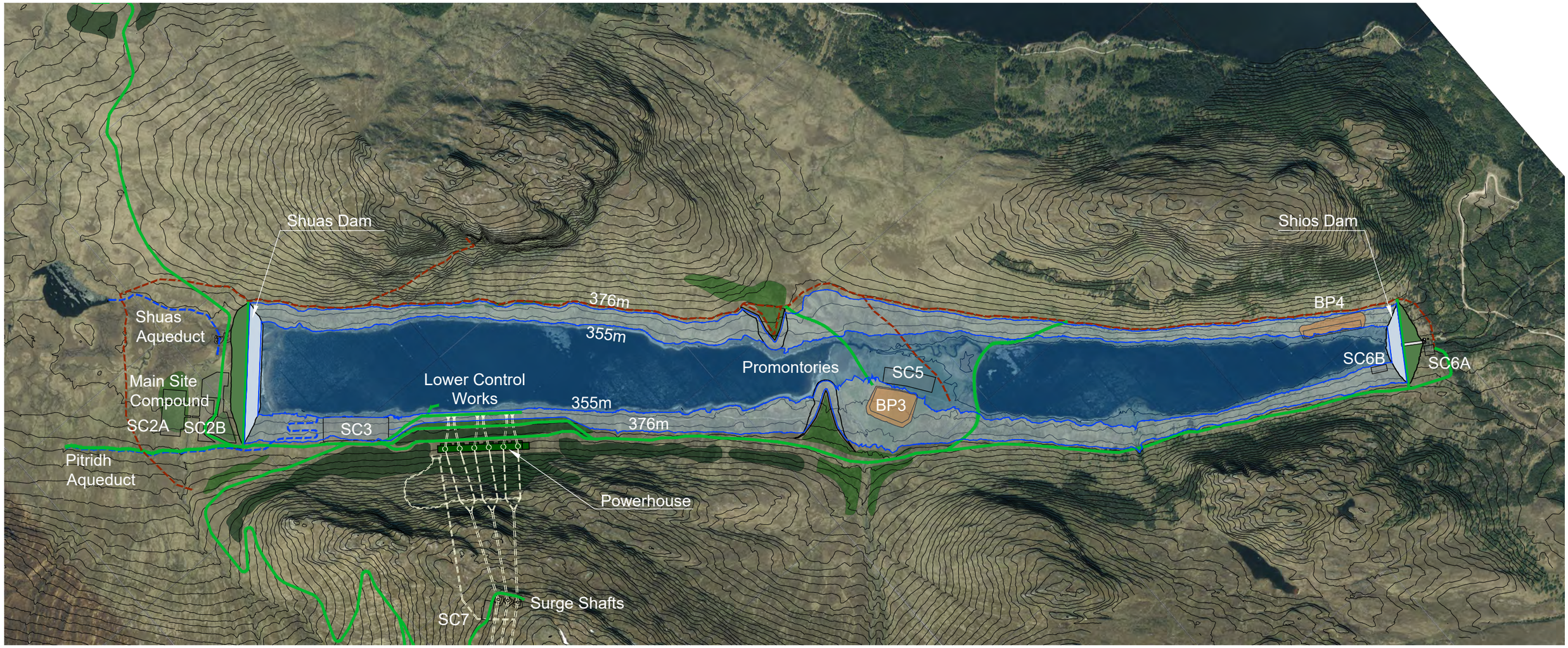
REVISION: P1

North

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).



Legend

- +376m Maximum Inundation Level
- +355m Minimum Water Level
- Dam Footprint
- Aqueduct / Diversion Channel
- PSH Track
- Estate Track / Footpath
- Powerhouse
- Tunnel
- Tunnel Adit
- Borrow Pit
- Compound
- Surge Shaft
- New Tree Planting - Riparian Mix
- New Tree Planting - Upland Mix

Lochan na h-Earba Inundation Plan

1:20,000 @ A3

0 500m 1000m

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.23	MH	FOR PLANNING	DT	GMcG

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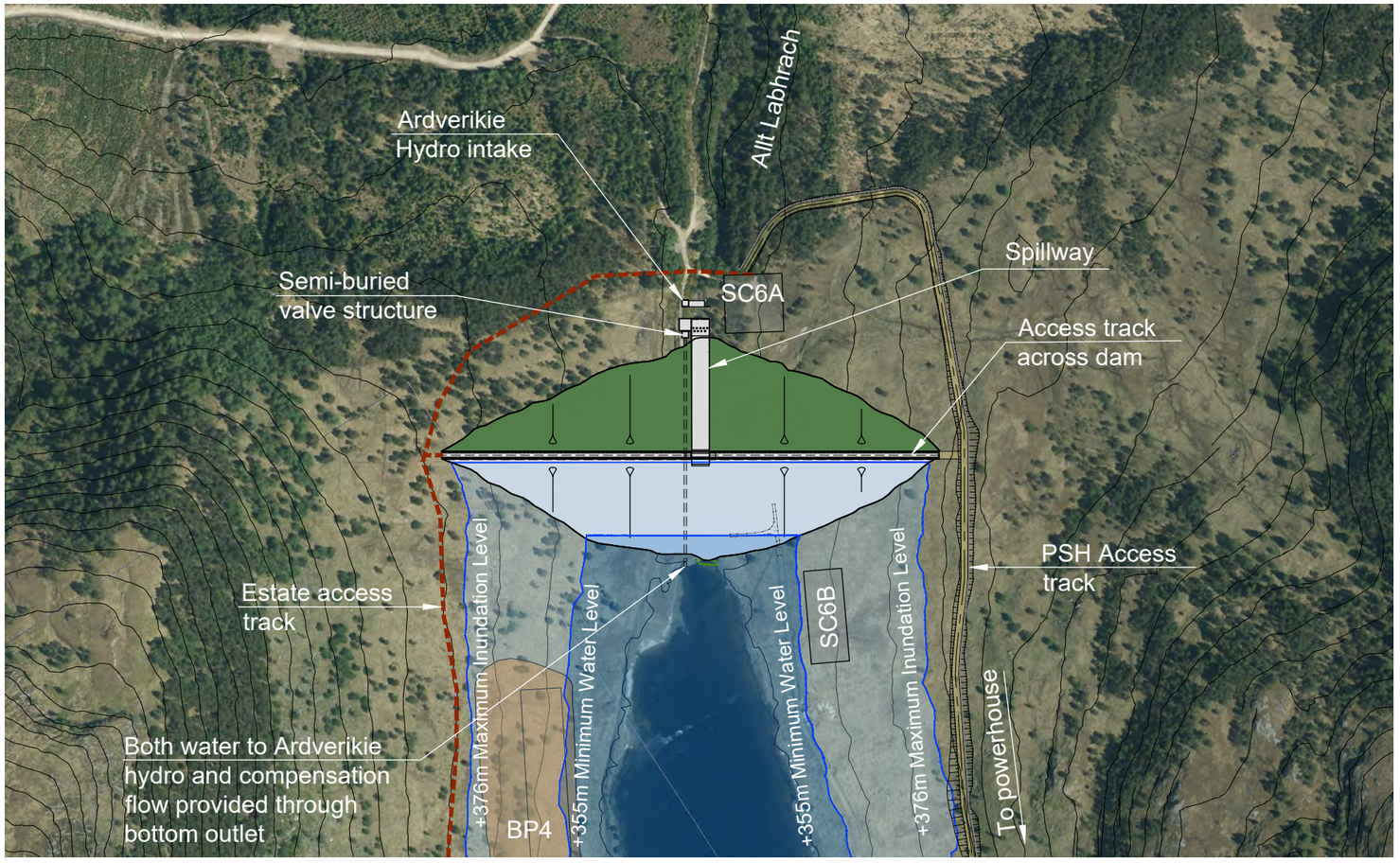
TITLE

LOWER EARBA RESERVOIR
PLAN VIEW
FIGURE 2.6

SIZE	SCALE AT A3	STATUS
A3	1:20,000	PLANNING

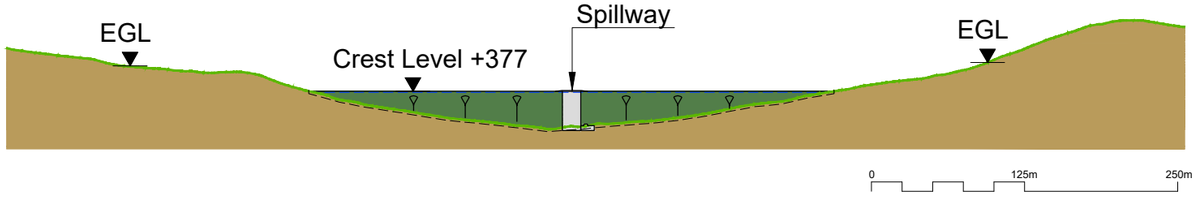
DRAWING NUMBER	REVISION
EAR/GEL/201	P1

North



Plan

1:5000 @ A3



Downstream Elevation

1:5000 @ A3

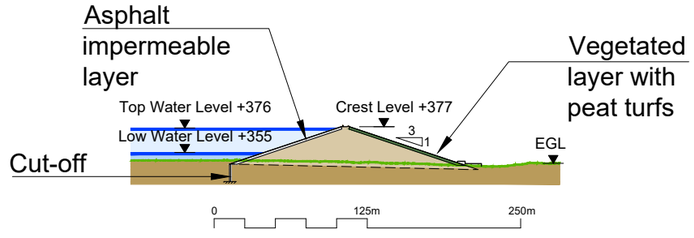
IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

LEGEND

- +376m Maximum Inundation Level
- +355m Minimum Water Level
- Dam Footprint
- Estate Track / Footpath
- Borrow Pit
- Compound



Dam Cross Section

1:5000 @ A3

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	03.01.24	MH	FOR PLANNING	DT	GMcG

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PROJECT: PROPOSED EARBA PSH

TITLE: SHIOS DAM
GENERAL ARRANGEMENT
FIGURE 2.7

SIZE	SCALE AT A3	STATUS
A3	1:5000	PLANNING

DRAWING NUMBER: EAR/GEL/203

REVISION: P1

North

+376m Maximum Water Level

+355m Minimum Water Level

+355m Minimum Water Level

+376m Maximum Water Level

To Powerhouse

Bridge over diversion channel

Access track across dam

Estate access track

Shuas Aqueduct

SC2A

Main site compound (temporary)

Pitridh Diversion channel with access track

SC2B

PSH Access track

Walking path diversion

To A86

To Leamhain dam

Plan

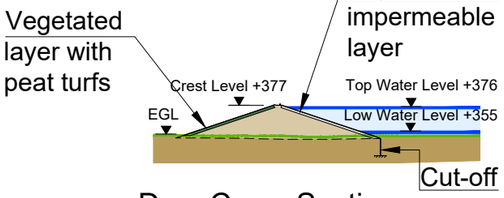
1:5000 @ A3

0 125m 250m

Downstream Elevation

1:5000 @ A3

0 125m 250m



Dam Cross Section

1:5000 @ A3

0 125m 250m

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

LEGEND

- +376m Maximum Inundation Level
- +355m Minimum Water Level
- Dam Footprint
- Estate Track / Footpath
- Aqueduct / Diversion Channel
- Compound
- New Tree Planting - Riparian Mix
- New Tree Planting - Upland Mix

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MH	FOR PLANNING	DT	GMcG

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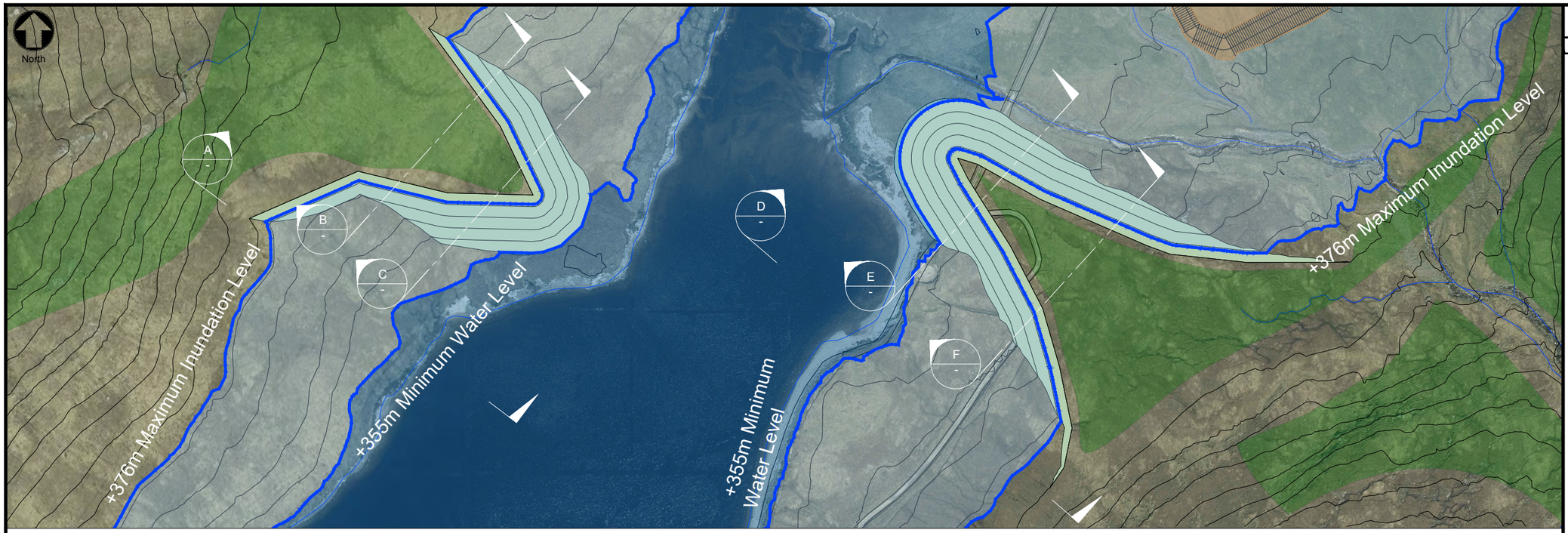
TITLE

SHUAS DAM
GENERAL ARRANGEMENT
FIGURE 2.8

SIZE	SCALE AT A3	STATUS
A3	1:5000	PLANNING

DRAWING NUMBER: EAR/GEL/220

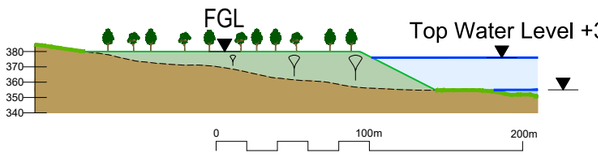
REVISION: P1



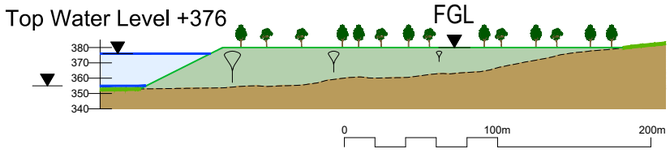
Plan

1:4000 @ A3

0 100m 200m

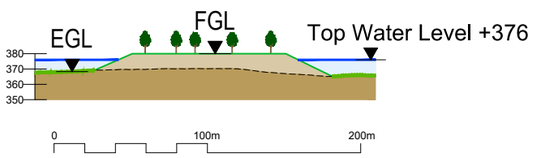


Top Water Level +355

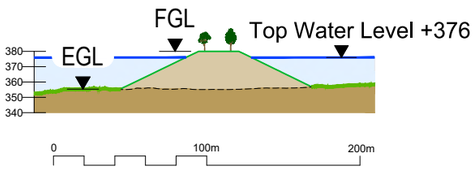


Section A -

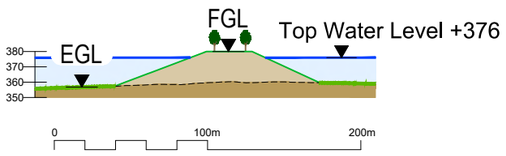
Section D -



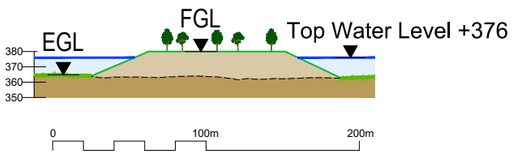
Section B -



Section E -



Section C -



Section F -

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MW	FOR PLANNING	DT	GMcG

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TITLE

GENERAL ARRANGEMENT
OF PROMONTARIES
FIGURE 2.9

SIZE	SCALE AT A3	STATUS
A3	1:2000 @ A3	PLANNING

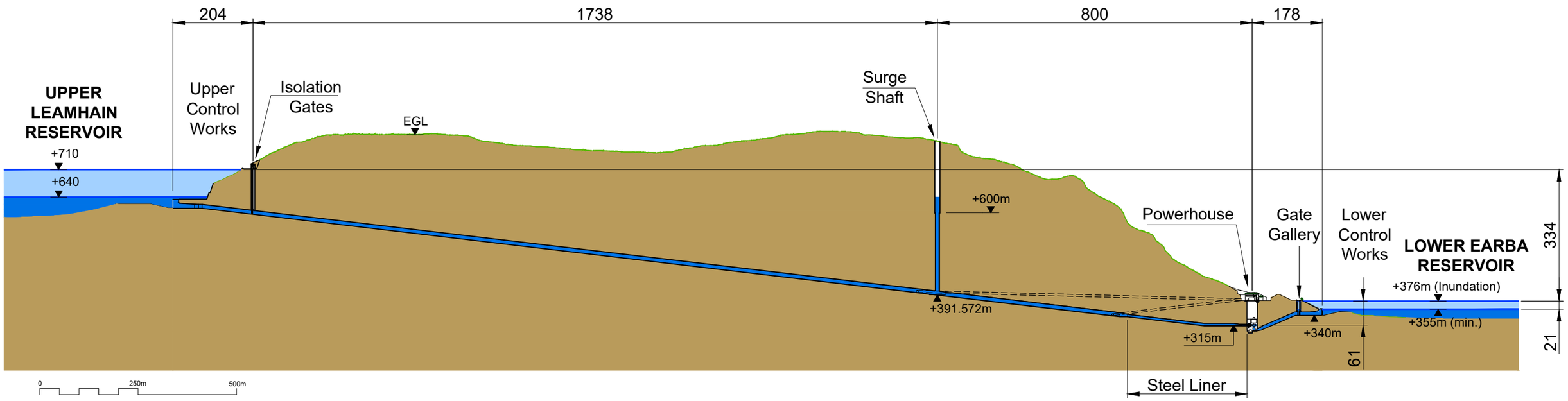
DRAWING NUMBER: EAR/GEL/230

REVISION: P1

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).
2. All dimensions are in metres unless noted otherwise.



Tunnel Section

1:10,000 @ A3

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MH	FOR PLANNING	DT	GMcG

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TITLE

TUNNEL SECTION
FIGURE 2.11

SIZE	SCALE AT A3	STATUS
A3	1:10,000	PLANNING

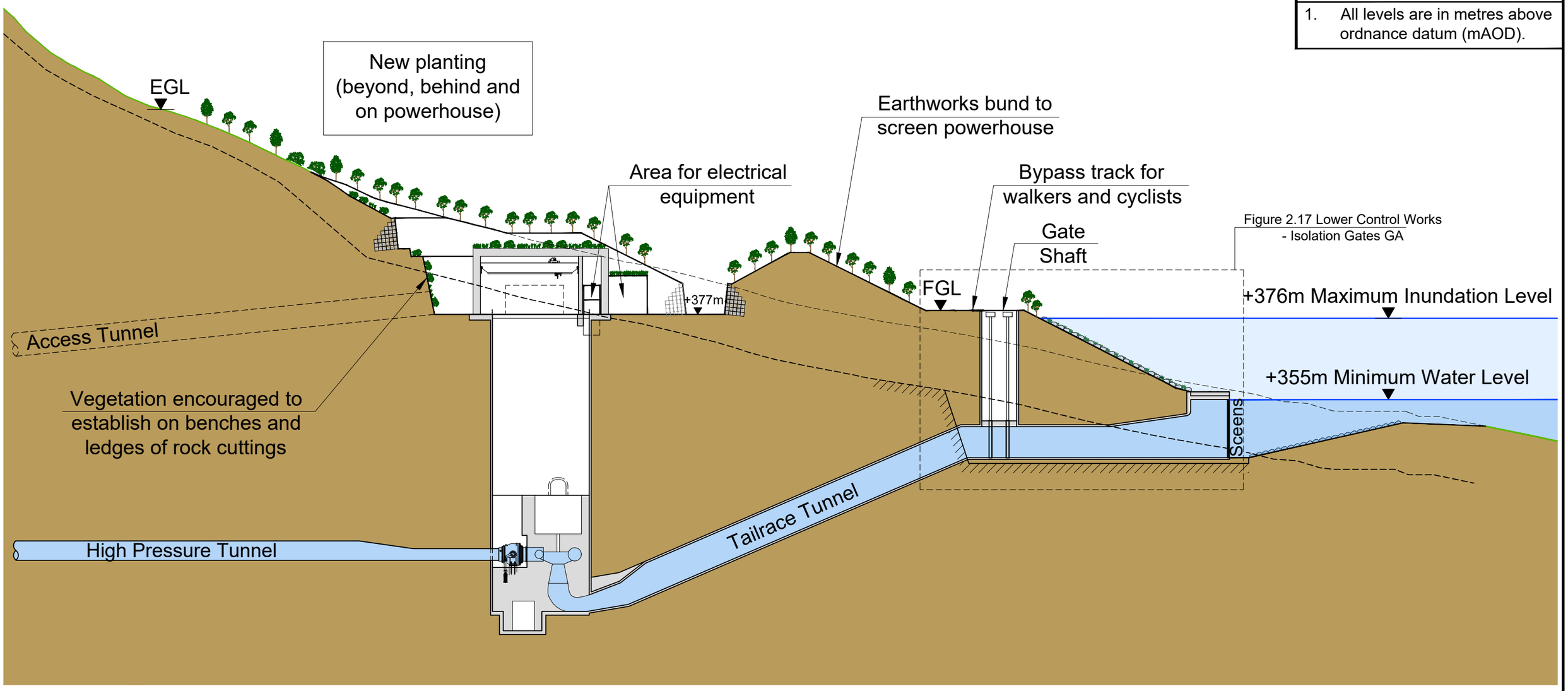
DRAWING NUMBER: EAR/GEL/502

REVISION: P1

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).



Powerhouse Section

1:1000 @ A3

0 25m 50m

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	26.01.24	MH	FOR PLANNING	DT	GMcG

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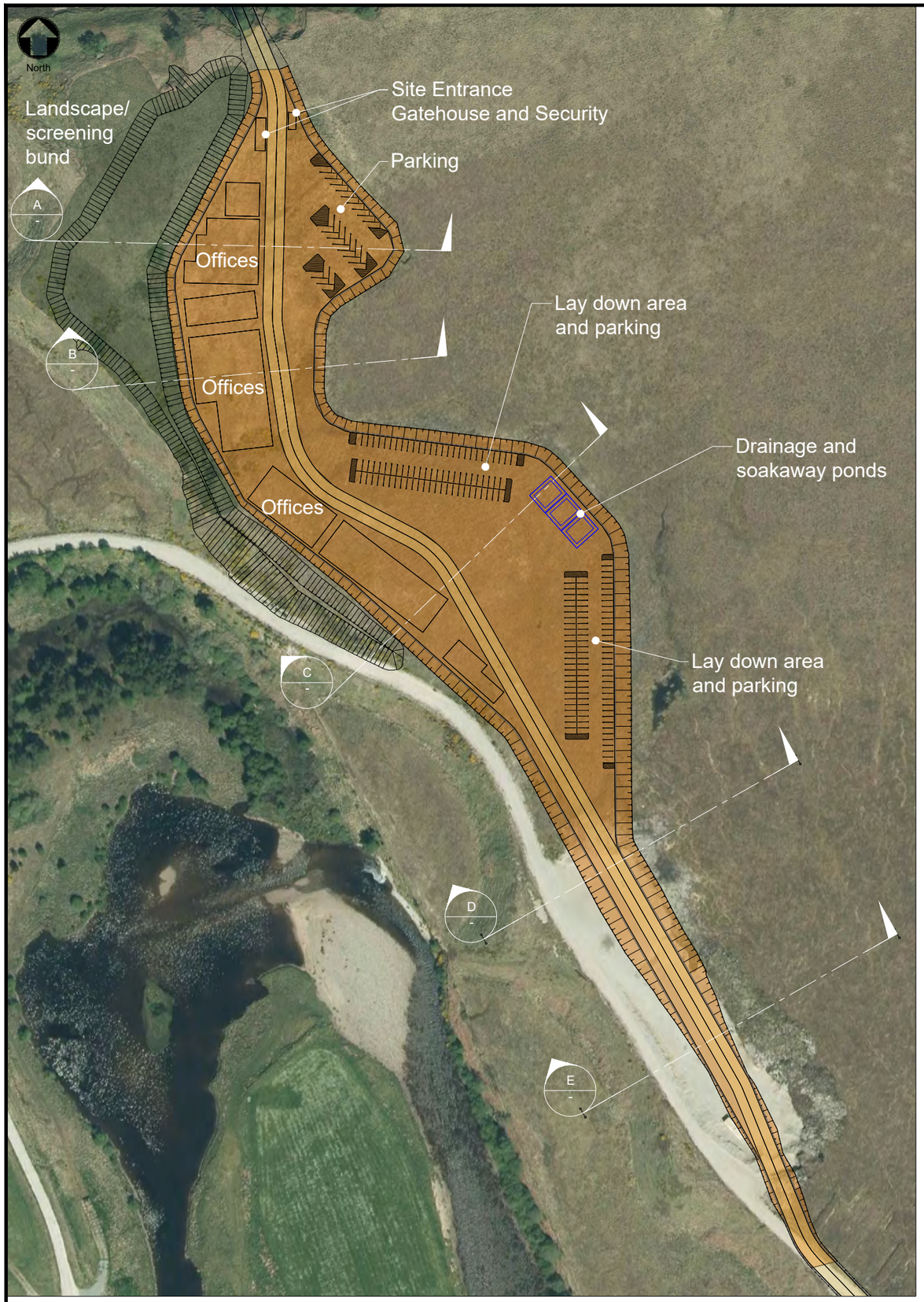
TITLE

POWERHOUSE
TYPICAL CROSS SECTION
FIGURE 2.19

SIZE	SCALE AT A3	STATUS
A3	1:1000	PLANNING

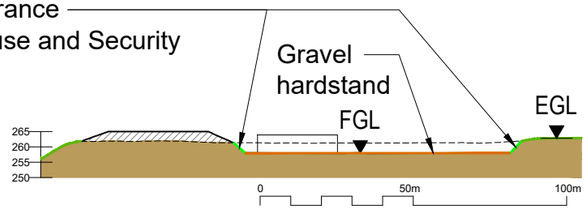
DRAWING NUMBER	REVISION
EAR/GEL/402	P1



Plan
1:2000 @ A3

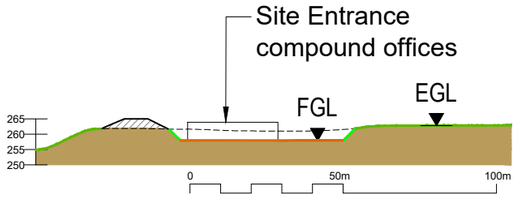
0 50m 100m

Site Entrance
Gatehouse and Security



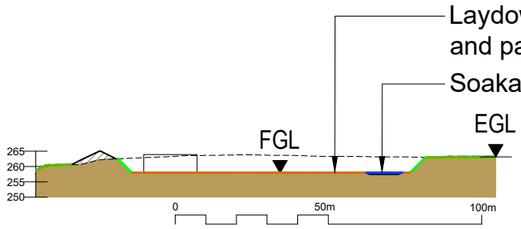
Section A
-

Site Entrance
compound offices

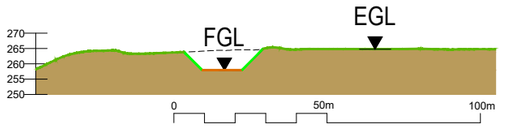


Section B
-

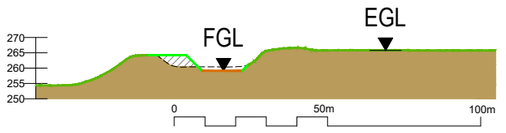
Laydown area
and parking
Soakaway ponds



Section C
-



Section D
-



Section E
-

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

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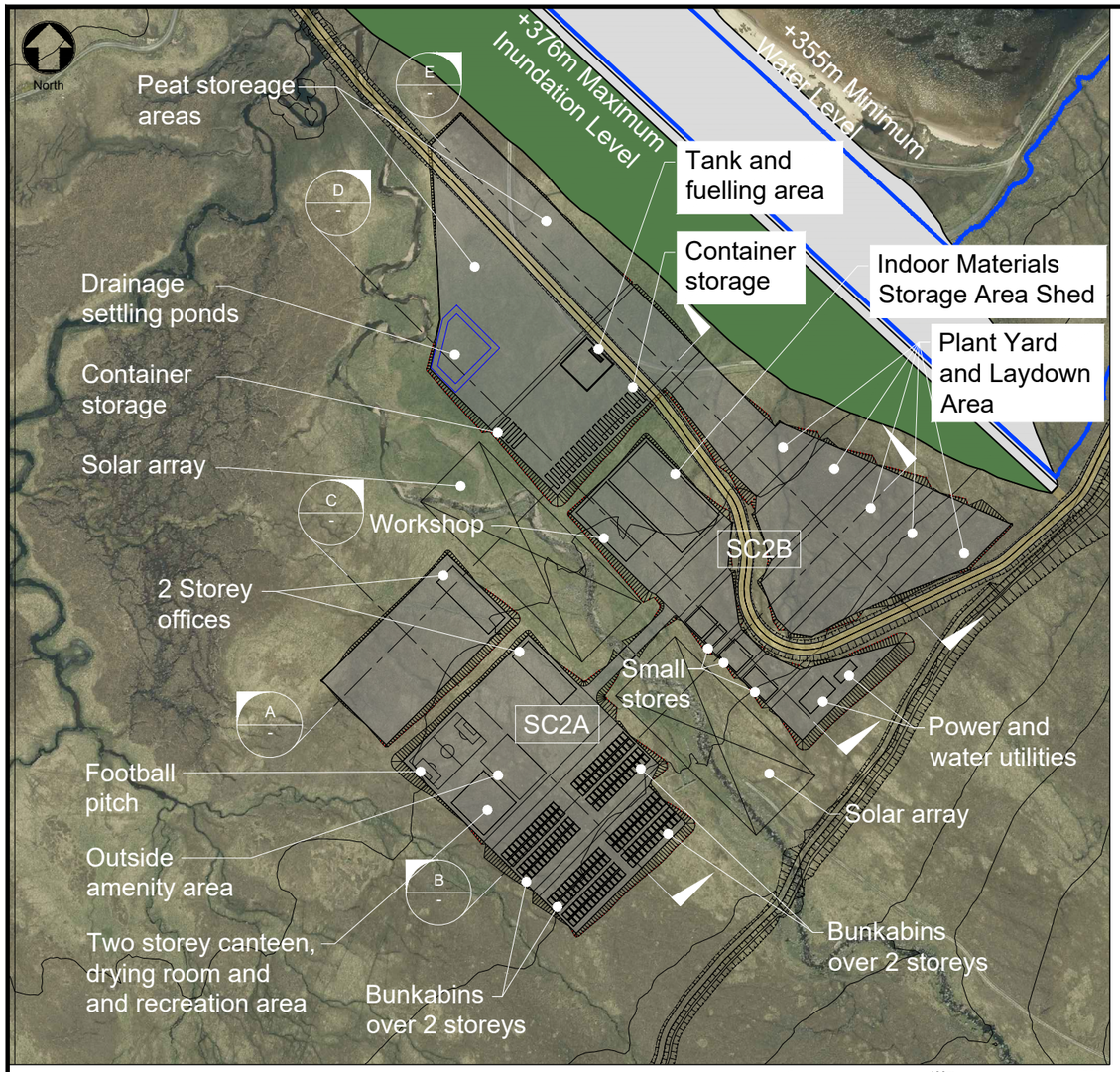
TITLE
SITE COMPOUND SC1 & BP1
PLAN & SECTIONS
FIGURE 2.2.1

SIZE	SCALE AT A3	STATUS
A3	1:2000 @ A3	PLANNING

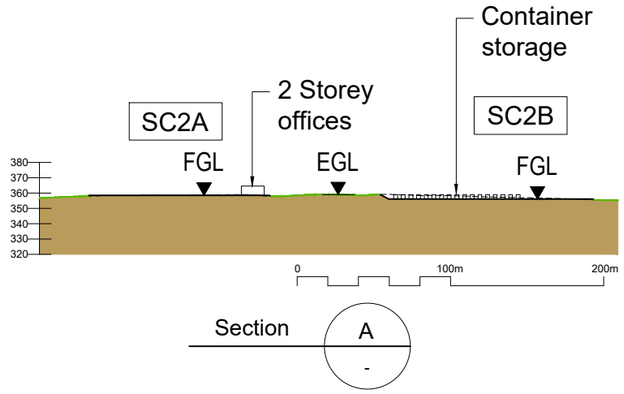
DRAWING NUMBER
EAR/GEL/170

REVISION
P1

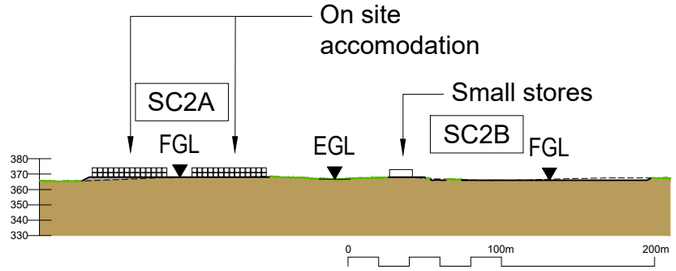


Plan

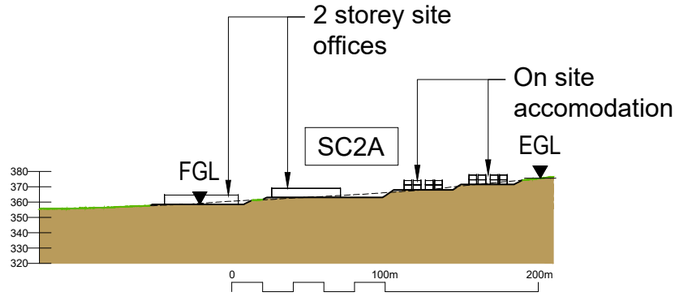
1:4000 @ A3



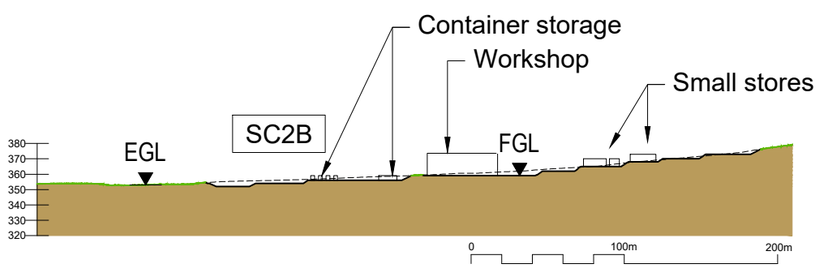
Section A -



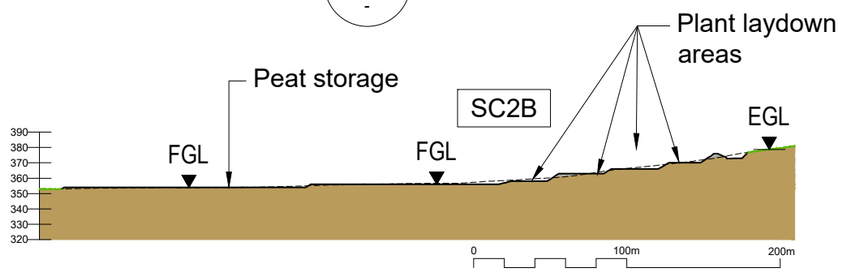
Section B -



Section C -



Section D -



Section E -

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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CLIENT

EARBA STORAGE
A GILKES ENERGY COMPANY

PROJECT

PROPOSED
EARBA PSH

TITLE

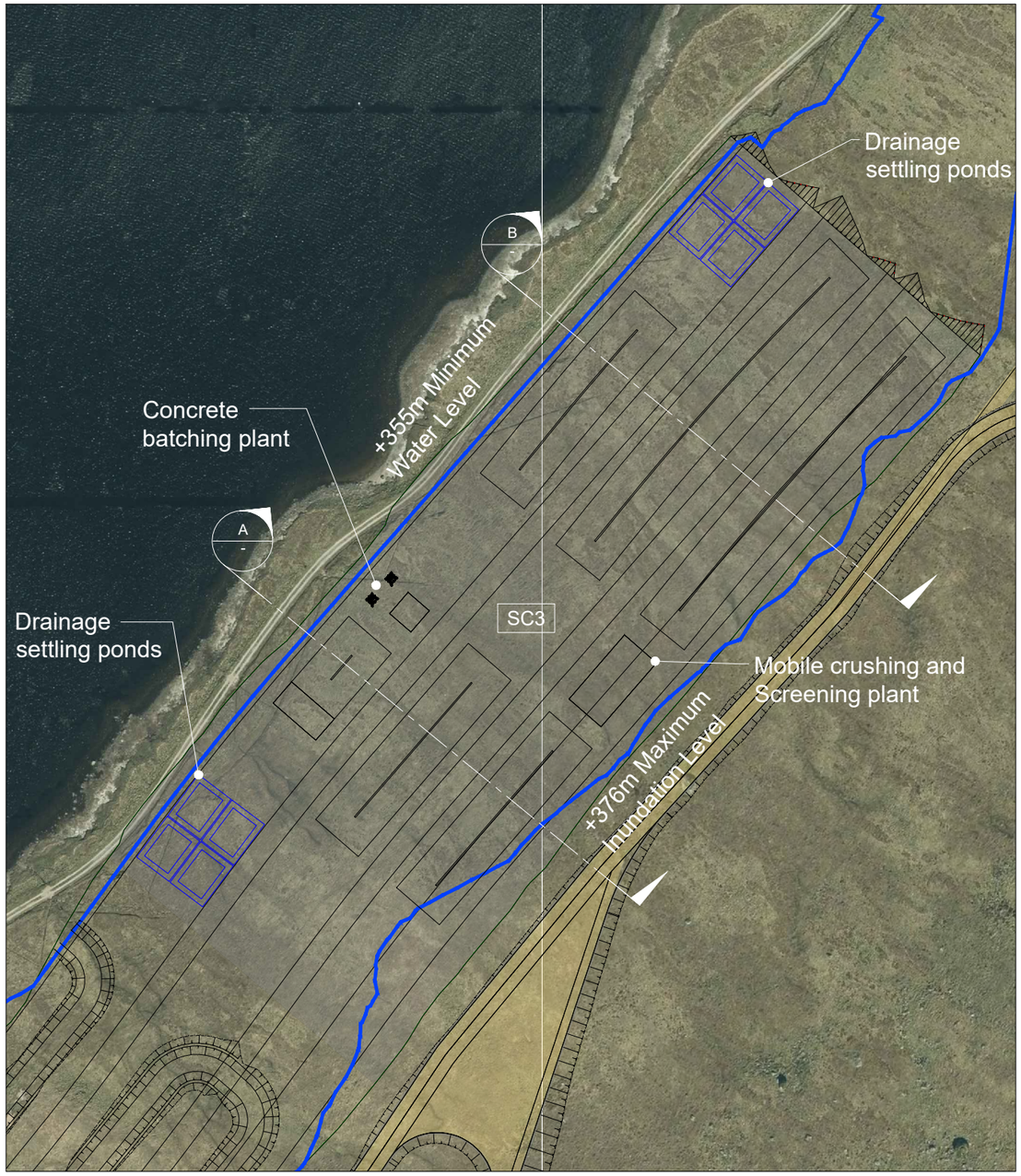
SITE COMPOUND SC2
SHUAS DAM - PLAN & SECTIONS
FIGURE 2.31

SIZE	SCALE AT A3	STATUS
A3	1:4000 @ A3	PLANNING

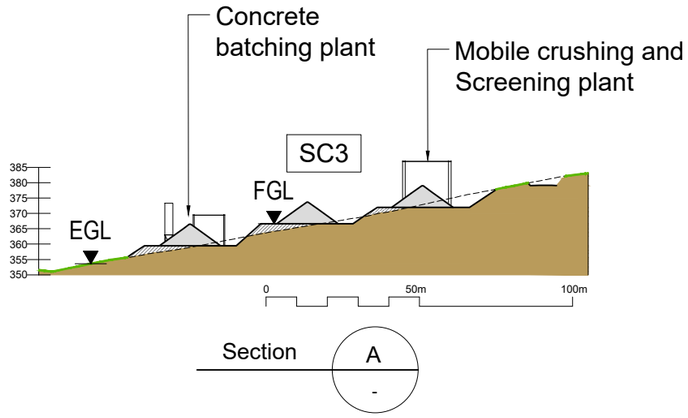
DRAWING NUMBER: EAR/GEL/180

REVISION: P1

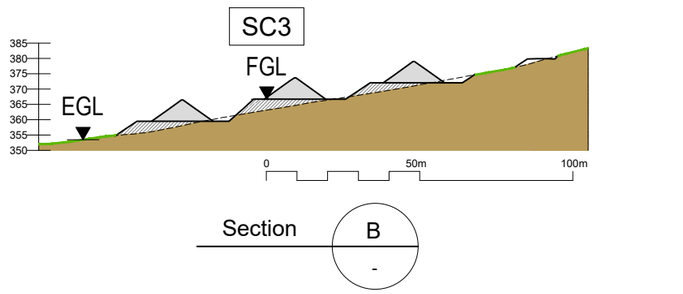
North



Plan
1:2000 @ A3



Section A
-



Section B
-

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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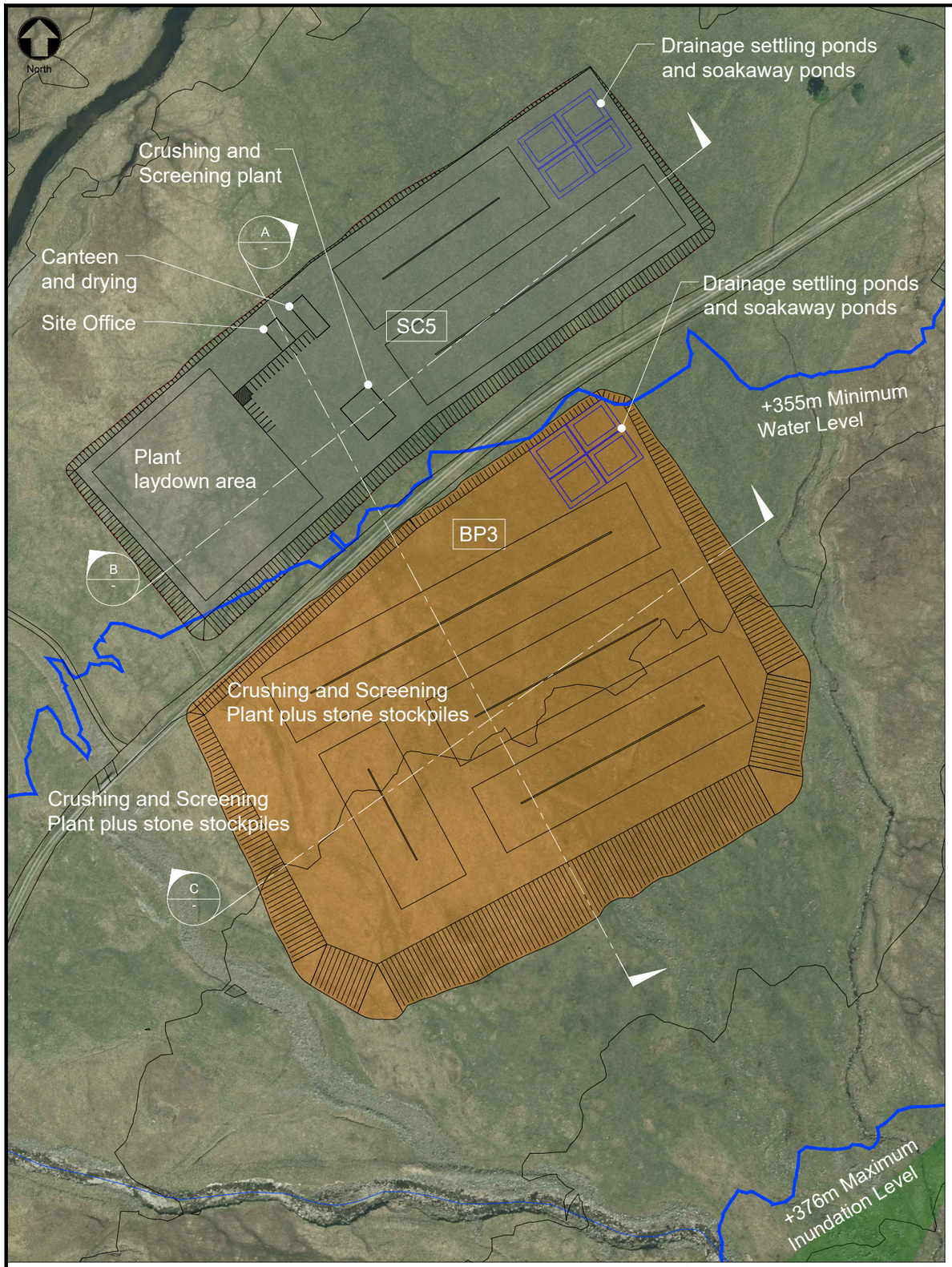
TITLE
SITE COMPOUND SC3
POWERHOUSE AREA
PLAN & SECTIONS - FIGURE 2.32

SIZE	SCALE AT A3	STATUS
A3	1:2000 @ A3	PLANNING

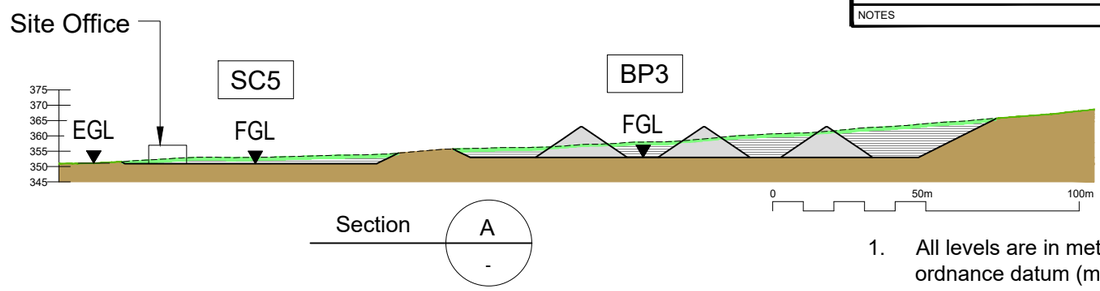
DRAWING NUMBER
EAR/GEL/181

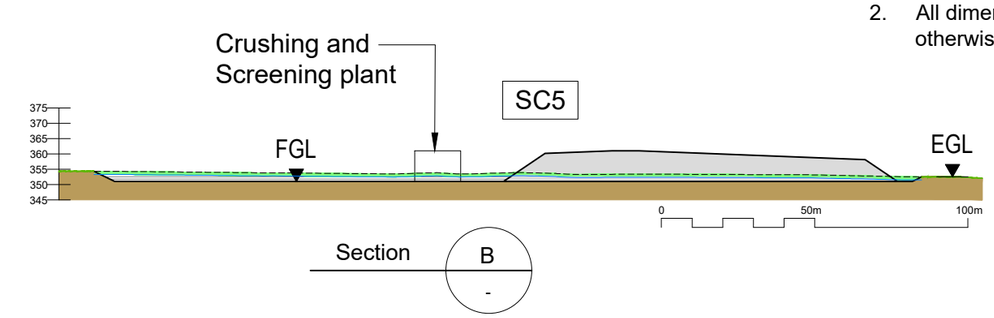
REVISION
P1

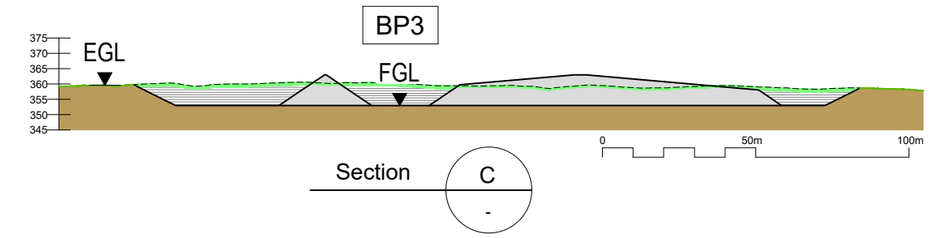


Plan
1:2,000 @ A3

0 50m 100m







IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).
2. All dimensions are in metres unless otherwise noted.

BP3

Stage 1
- Strip existing topsoil and superficial materials to expose clean sands and gravels, assume 0.5m thick.
- Then remove sands and gravels to depth shown on drawing

Stage 2
- Use the borrow pit to select, crush and screen the sands and gravels and stockpile for use in dams and tracks and rip rap.

Stage 3
- Backfill borrow pit with selected unsuitable materials from the borrow pits, powerhouse, tunnels and dam works
- Cap off with topsoil and turfs to reinstate to existing ground level.

SC5

Stage 1
- Strip topsoil and turfs

Stage 2
- Use area for crushing and screening and stone stockpiles as well as site establishment area

Stage 3
- Grade off back to existing ground profile and reinstate topsil and turfs

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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PROJECT
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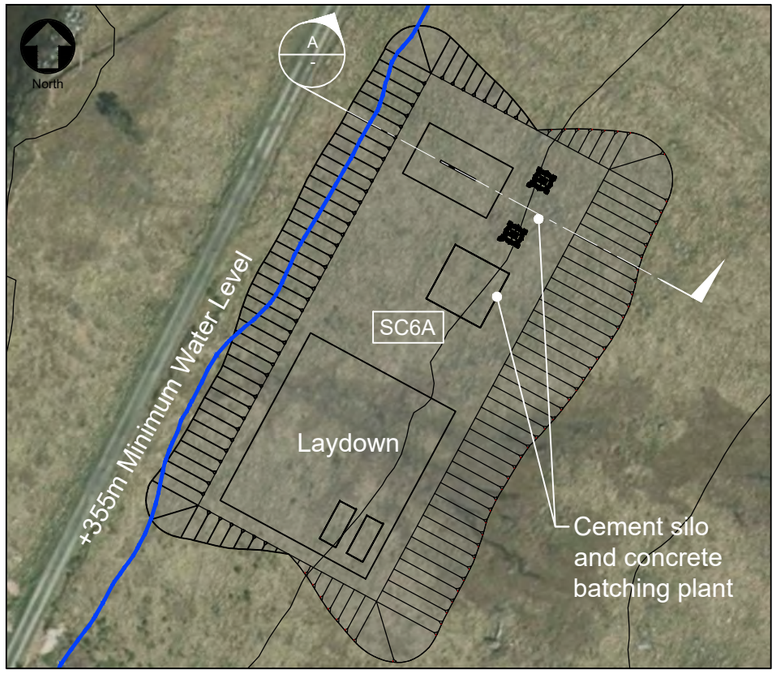
TITLE
BORROW PIT BP3 & SC5
PLAN & SECTIONS
FIGURE 2.33

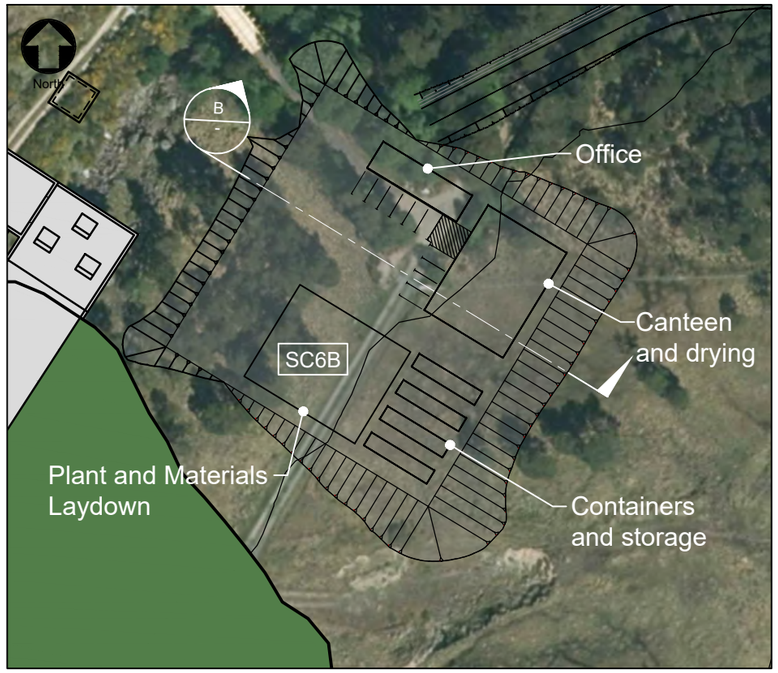
SIZE	SCALE AT A3	STATUS
A3	1:2000 @ A3	PLANNING

DRAWING NUMBER
EAR/GEL/172

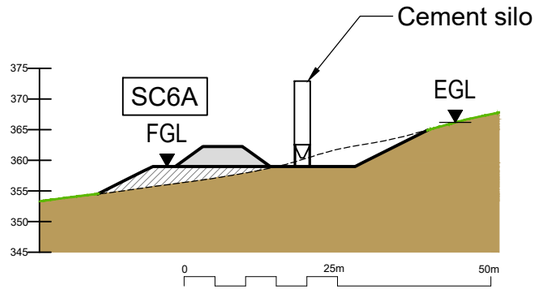
REVISION
P1



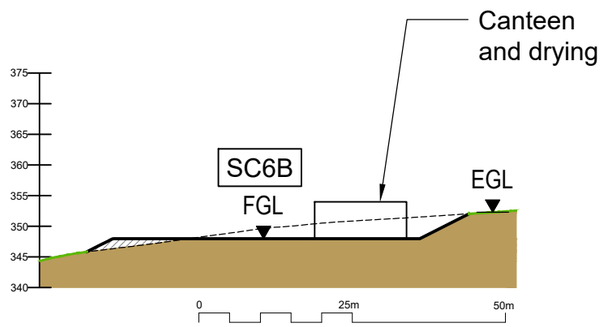
Plan
1:1000 @ A3



Plan
1:1000 @ A3



Section A
-



Section B
-

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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GLASGOW
G2 2LB
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PROJECT
PROPOSED
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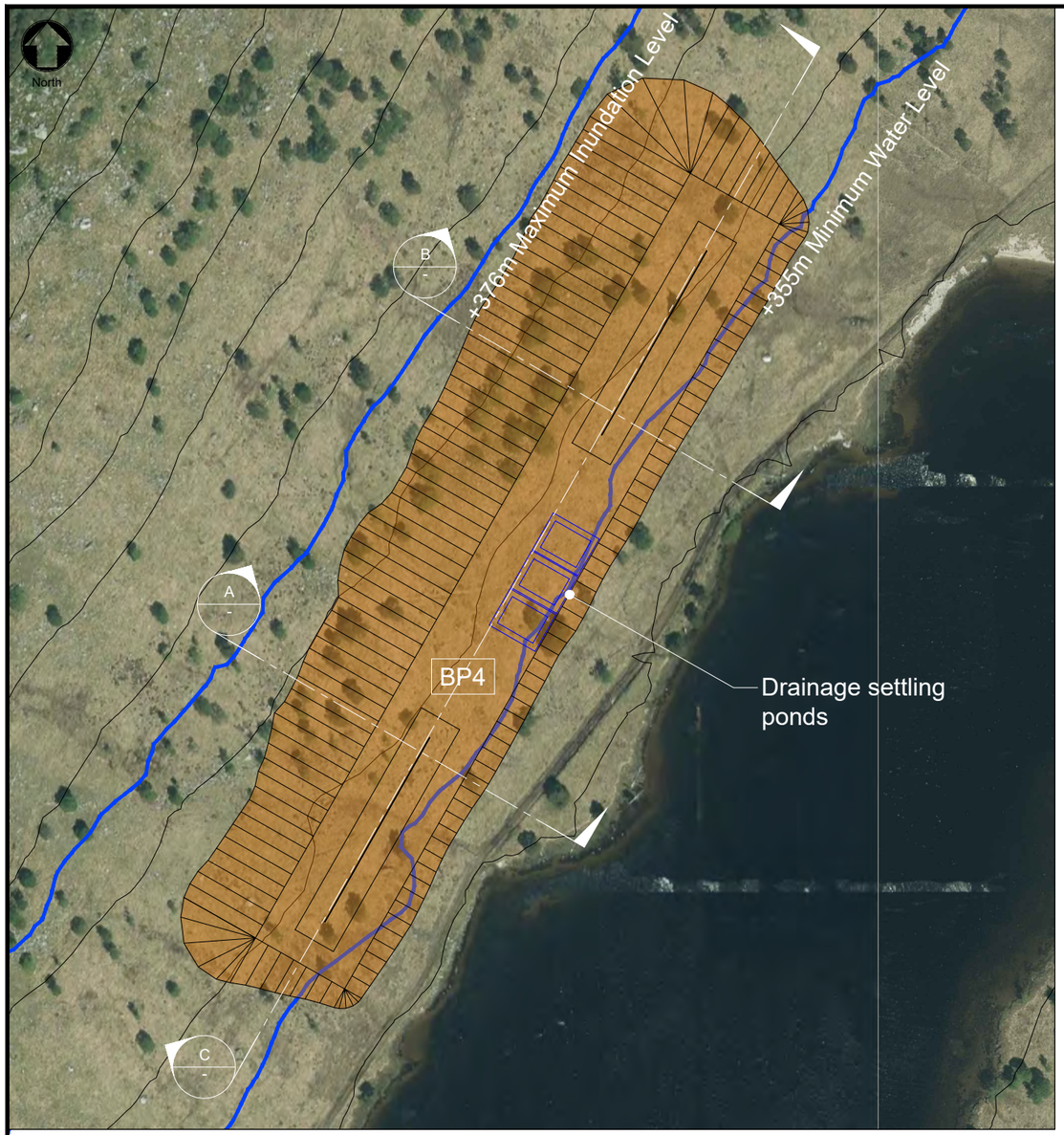
TITLE
WORKING AREA SC6A & SC6B
PLAN & SECTIONS
FIGURE 2.34

SIZE	SCALE AT A3	STATUS
A3	1:1000 @ A3	PLANNING

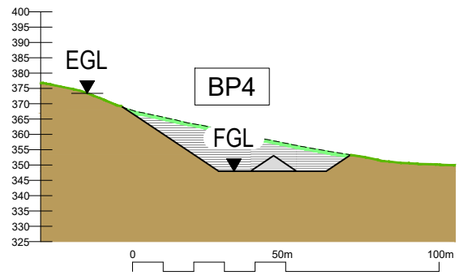
DRAWING NUMBER
EAR/GEL/183

REVISION
P1

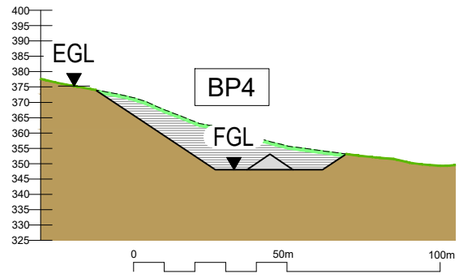


Plan
1:2000 @ A3

0 50m 100m



Section A
-

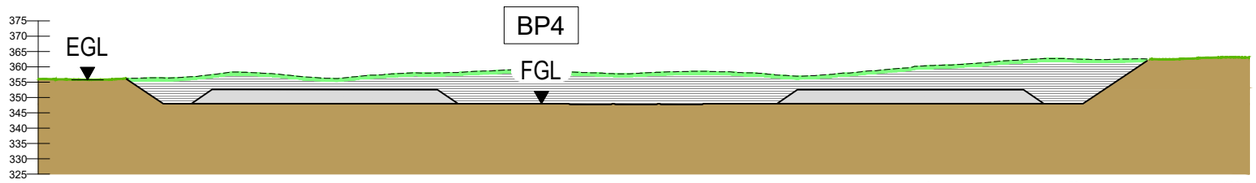


Section B
-

Stage 1
- Strip existing topsoil and superficial materials to expose clean sands and gravels, assume 0.5m thick.
- Then remove sands and gravels to depth shown on drawing

Stage 2
- Use the borrow pit to select, crush and screen the sands and gravels and stockpile for use in dams and tracks and rip rap.

Stage 3
- Backfill borrow pit with selected unsuitable materials from the borrow pits, powerhouse, tunnels and dam works
- Cap off with topsoil and turfs to reinstate to existing ground level.



Section C
-

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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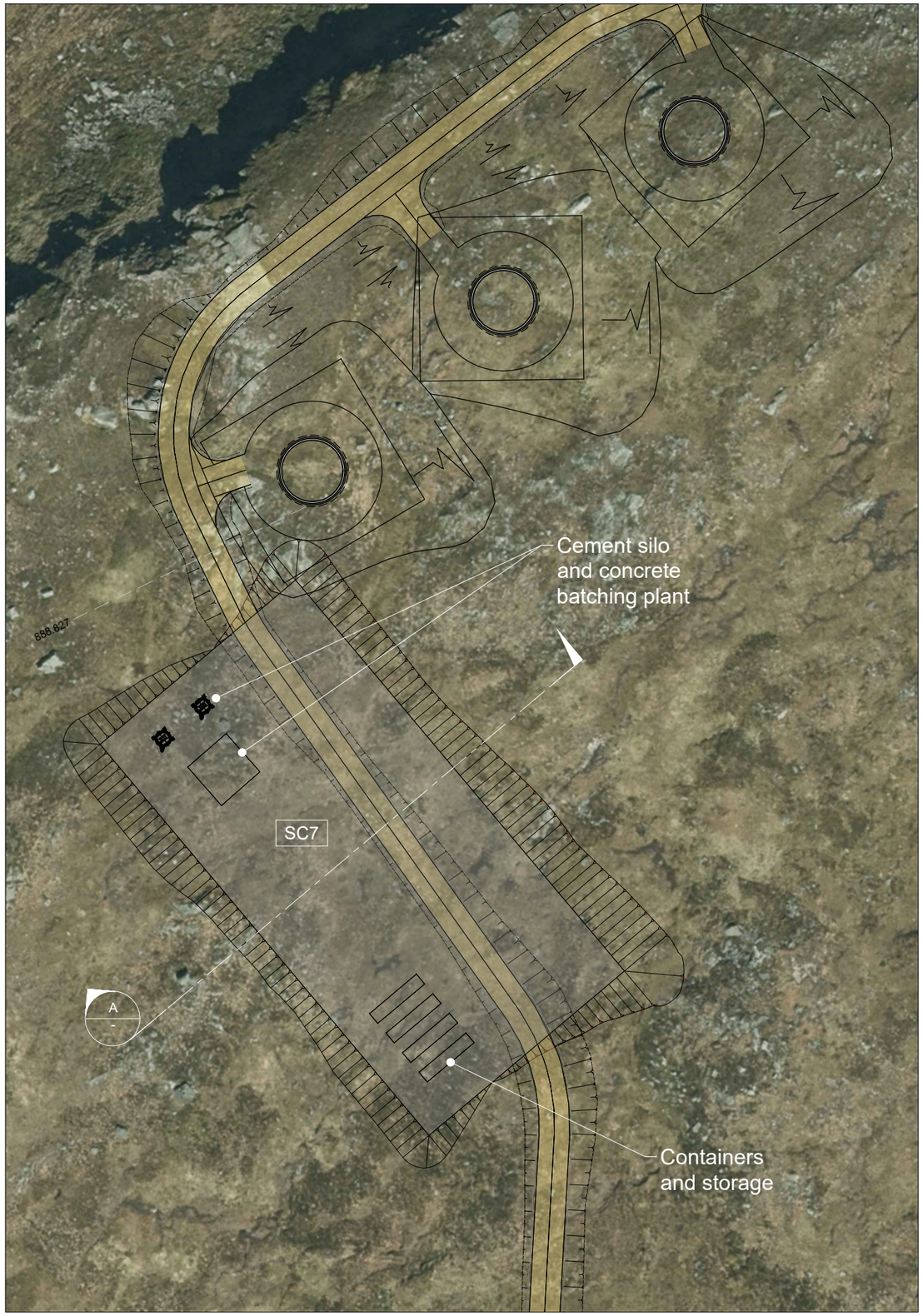
TITLE
BORROW PIT BP4
PLAN & SECTIONS
FIGURE 2.2.3

SIZE	SCALE AT A3	STATUS
A3	1:2000 @ A3	PLANNING

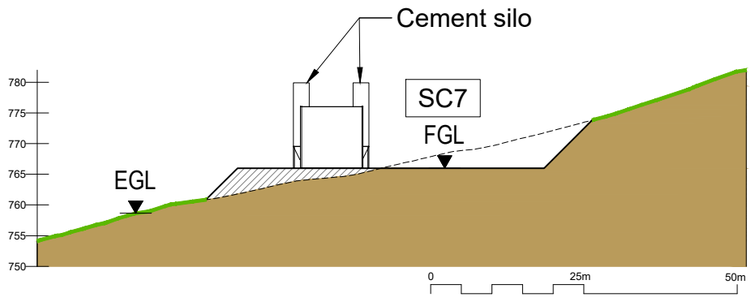
DRAWING NUMBER	REVISION
EAR/GEL/173	P1

North



Plan
1:1000 @ A3

0 25m 50m



Section A -

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
FESTIVAL HOUSE
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GLASGOW
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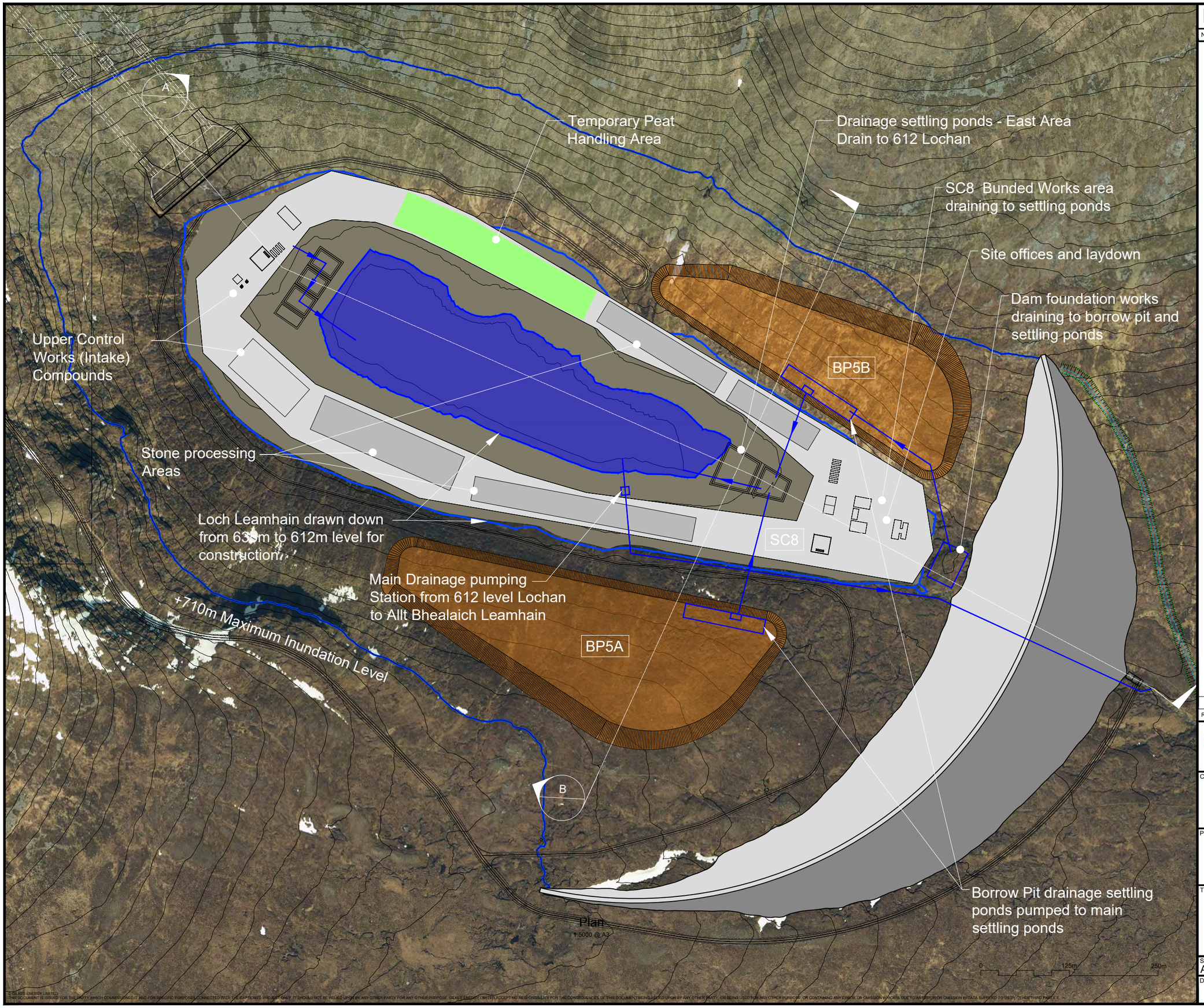
TITLE
SITE COMPOUND SC7
SURGE SHAFT AREA
PLAN & SECTIONS - FIGURE 2.35

SIZE	SCALE AT A3	STATUS
A3	1:1000 @ A3	PLANNING

DRAWING NUMBER
EAR/GEL/184

REVISION
P1



IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy

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PROJECT

PROPOSED
EARBA PSH

TITLE

SITE COMPOUND SC8
LEAMHAIN DAM - PLAN
FIGURE 2.36

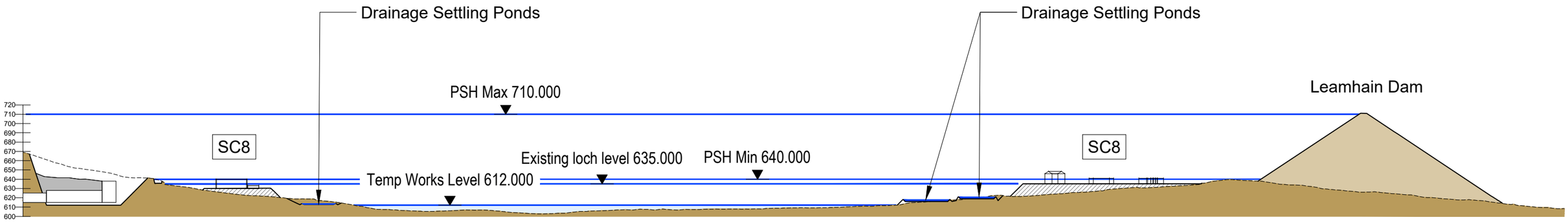
SIZE	SCALE AT A3	STATUS
A3	1:5000 @ A3	PLANNING

DRAWING NUMBER	REVISION
EAR/GEL/190	P1

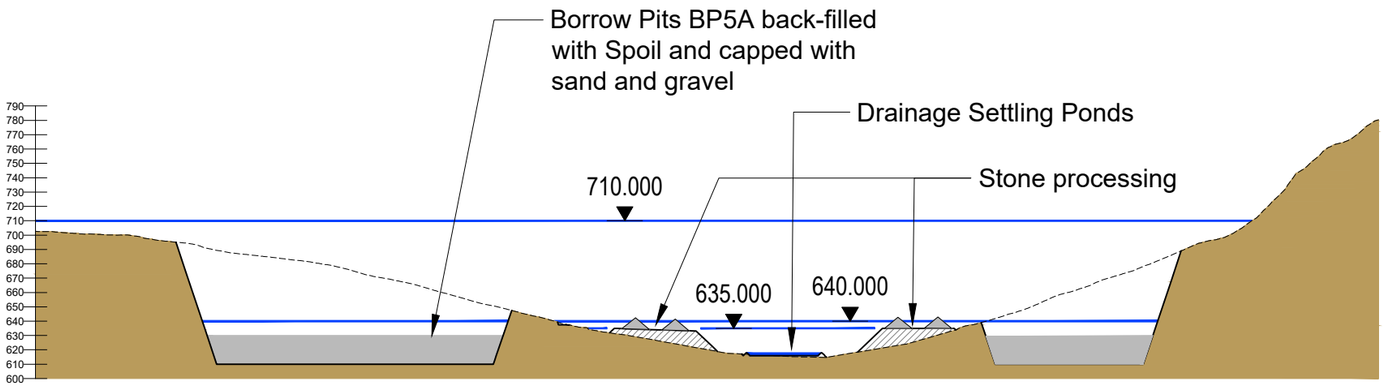
IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).
2. All dimensions are in millimeters unless otherwise noted.



Section A -



Section B -

P1	02.02.24	MW	FOR PLANNING	DT	GMcG
REV	DATE	DRAWN	NOTES	CH'K'D	APP'D

GILKES energy

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EARBA PSH

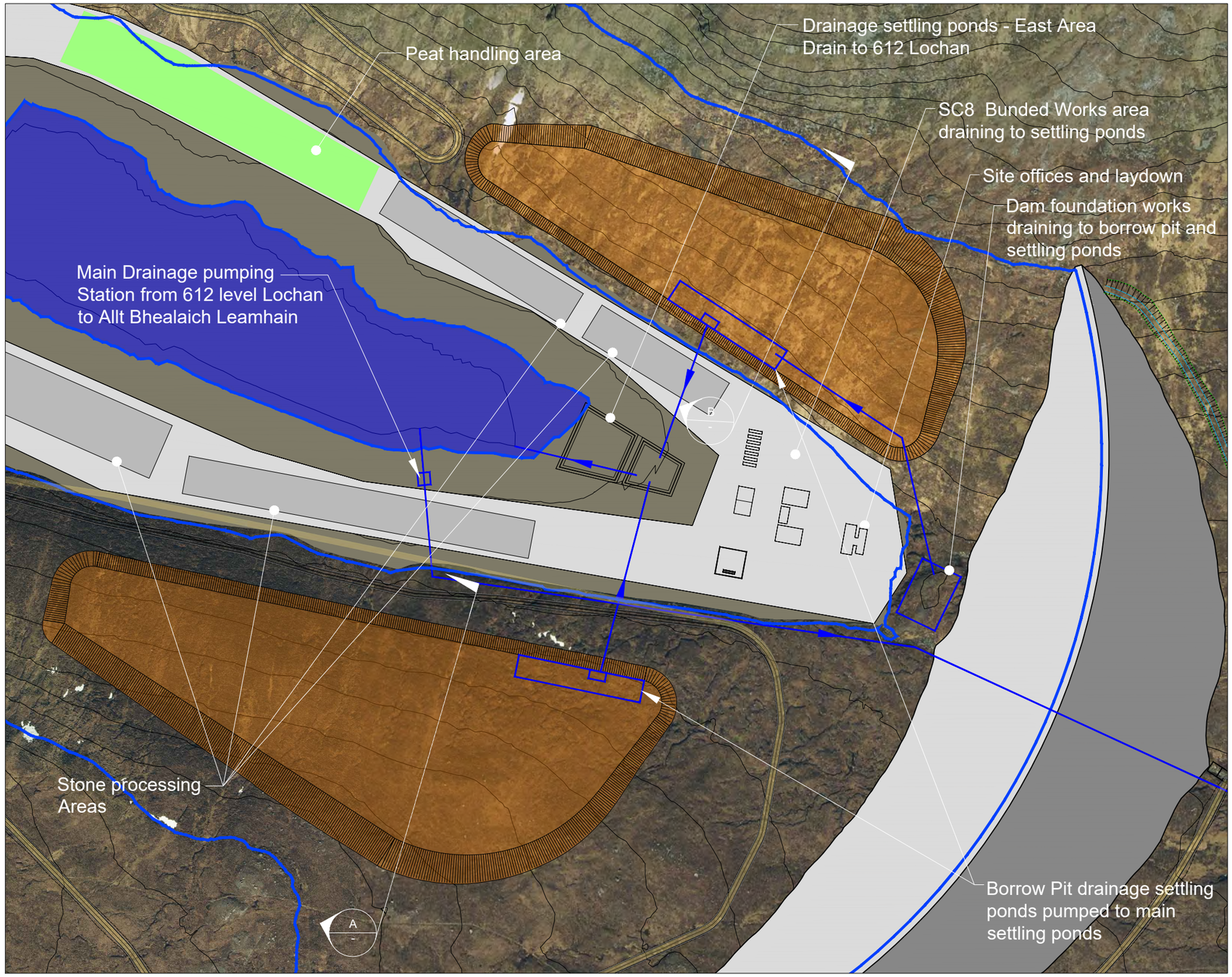
TITLE

SITE COMPOUND SC8
LEAMHAIN DAM - SECTIONS
FIGURE 2.37

SIZE	SCALE AT A3	STATUS
A3	NTS	PLANNING

DRAWING NUMBER	REVISION
EAR/GEL/191	P1

North



Plan
1:4000 @ A3

0 100m 200m

IF IN DOUBT - ASK

NOTES

1. All levels are in metres above ordnance datum (mAOD).

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P1	02.02.24	MW	FOR PLANNING	DT	GMcG

GILKES energy
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GLASGOW
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PROJECT
PROPOSED
EARBA PSH

TITLE
BORROW PIT BP5A AND 5B
PLAN
FIGURE 2.2.4

SIZE	SCALE AT A3	STATUS
A3	1:4000 @ A3	PLANNING

DRAWING NUMBER: EAR/GEL/174
REVISION: P1

North

Information Board

Information Board

8m

8m

8m

8m

8m

1m

1m

3m

3m

New Foot bridge

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

6m

1m

10m

5m

5m

Plan
1:35,000 @ A3

IF IN DOUBT - ASK

NOTES

- Development Red Line Boundary
- Existing Estate Track / Footpath (within the Development Red Line Boundary)
- Existing East Highland Way Route
- Existing Mountain Route (informal path based on route information from Walk Highlands website)
- PSH Track
- Estate Track / Footpath
- East Highland Way Route Diversion
- Mountain Route Diversion
- Redundant Estate Track / Footpath
- Formal Path Crossing Point with Warning Signage
- Information Board
- Inundation
- Dam
- Intake
- Surge Shaft
- Adit
- Shios Valve House and Fish Pool
- Leamhain Upper Gate House
- Leamhain Lower Valve House
- Tunnel
- Powerhouse
- Promontories
- Aqueduct / Diversion Channel
- Access Bridge
- Leamhain Dam Spillway
- 6m — Denotes Track Width

0 500m 1000m

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P2	26.01.24	MH	FOR PLANNING	DT	GMcG
P1	19.12.23	MH	FOR PLANNING	DT	GMcG

GILKES energy
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A GILKES ENERGY COMPANY

PROJECT
PROPOSED EARBA PSH

TITLE
SITE PLAN SHOWING ACCESS ROUTES & FOOTPATHS DURING CONSTRUCTION - FIGURE 15.2

SIZE	SCALE AT A3	STATUS
A3	1:35,000	PLANNING

DRAWING NUMBER: EAR/GEL/022
REVISION: P1

North

Information Board

3.5m

Information Board

6m

1m

4m

3m

4m

6m

3.5m

3m

6m

1m

3m

4m

4m

4m

4m

4m

4m

4m

4m

4m

1m

4m

3.5m

3m

Plan
1:35,000 @ A3

IF IN DOUBT - ASK

NOTES

- Development Red Line Boundary
- Estate Track / Footpath (within the Development Red Line Boundary)
- East Highland Way Route
- Mountain Route
- PSH Track
- Information Board
- Inundation
- Dam
- Intake
- Surge Shaft
- Adit
- Shios Valve House and Fish Pool
- Leamhain Upper Gate House
- Leamhain Lower Valve House
- Tunnel
- Powerhouse
- Promontories
- Aqueduct / Diversion Channel
- Access Bridge
- Leamhain Dam Spillway
- 4m — Denotes Track Width

0 500m 1000m

REV	DATE	DRAWN	NOTES	CH'K'D	APP'D
P2	26.01.24	MH	FOR PLANNING	DT	GMcG
P1	19.12.23	MH	FOR PLANNING	DT	GMcG

GILKES energy
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GLASGOW
G2 2LB
UNITED KINGDOM
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A GILKES ENERGY COMPANY

PROJECT
PROPOSED
EARBA PSH

TITLE
SITE PLAN SHOWING ACCESS ROUTES & FOOTPATHS DURING OPERATION - FIGURE 15.3

SIZE	SCALE AT A3	STATUS
A3	1:35,000	PLANNING

DRAWING NUMBER
EAR/GEL/023

REVISION
P1