Scottish Government

Energy Consents and Deployment Unit

Scoping Opinion on behalf of the Scottish Ministers under Part III of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000

Coire Glas Hydro Pumped Storage Ltd.

Revised Coire Glas Pumped Storage Scheme

July 2017

Contents

1. Introduction

This scoping opinion is issued on behalf of the Scottish Ministers to Coire Glas Hydro Pumped Storage Ltd, ('the Applicant') who submitted a request for a scoping opinion to Scottish Ministers in relation to the proposed revised Coire Glas Pumped Storage Scheme on 12 May 2017.

In preparing this scoping opinion, the Scottish Ministers have consulted with the applicant; Highland Council, who are the planning authority for the area in which the proposed development would be situated; Scottish Natural Heritage (SNH); the Scottish Environment Protection Agency (SEPA) and other bodies whom the Scottish Ministers consider are likely to have an interest in the proposed application.

The Scottish Ministers are satisfied that the requirements for consultation set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 and regulation 40 of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, have been met and have considered all representations received by them pursuant to that consultation.

In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

2. Site specific issues of interest to the Scottish Ministers

This scoping opinion is a written statement of opinion of the Scottish Ministers as to the information to be provided in the EIA report that will accompany the application for the proposed Hydro Pumped Storage Scheme. Subject to specific comments below the Scottish Ministers expect the EIA report to include detail on all matters raised by consultees in the correspondence appended to this opinion.

AM Geomorphology advise that for the proposed Coire Glas Scheme, while peat is localised, it is within areas proposed for infrastructure. Given the proximity of the Allt a' Choire Gllais and the connectivity of the watercourse to Loch Lochy the risks associated with peat instability should be assessed. The assessment should be in the form of a Peat Landslide Hazard and Risk Assessment as detailed in the recently revised Scottish Government Best Practice Guidance (2017).

Highland Council has no significant concerns over the amended project. The main issues is the uncertainty in respect of rock removal and rock disposal. These raise concerns in respect of construction noise and potential of dust pollutions. Any future application will need to recognise the potential increased issues to be managed and the importance of baseline information being available in respect of current noise levels etc. The Highland Council have also identified key changes to the Development Plan policies and other planning policies and guidance, these are detailed in their response at appendix 1.

Historic Environment Scotland are content with the approach set out in the scoping report in respect to their remit. The refer the applicant to the national policy set out in the Managing Change in the Historic Environment guidance.

Marine Scotland Science request the applicant to pay particular attention to section 6.8 of the scoping report and to refer to previous correspondence exchanged regarding the presence of Arctic Char in Loch Lochy and matters relating to ferox brown trout and to underwater noise during construction.

RSPB advise that since previous survey work conducted in 2010 highlighted the presence of Golden Eagles, it has been confirmed that breeding occurred in 2015. RSPB advise the potential impacts on this species should be adequately covered in the EIA report. Further details on suggested mitigation is contained in their response appended to this scoping opinion at appendix 1

Scottish Canals has been in positive dialogue with SSE and have been developing a Collaboration Agreement to formalise the relationship. With regard to the revised scheme, Scottish Canals, as the statutory operator of the Caledonian Canal would welcome the consideration of several environmental issues in relation the their interests as part of the EIA process. West Highland Sailing have concerns regarding moving water levels and Scottish Canals will represent their business interests at discussions. All of these issues are set out in detail in the response at appendix 1.

Scottish Water request the EIA report should include an assessment of the potential impacts on water abstraction at Camisky Wellfield including hydrological modelling results. Scottish Water requirements for inclusion in the EIA report are set out in detail in their response to the scoping consultation which is appended at Annex 1 of this scoping Opinion. Some of the information required is of a confidential nature and should be included in the EIA report as a separate confidential Annex which is not for publication.

Scotways are pleased that Figure 2 of the scoping report indicates that routes promoted in the "Scottish Hill Tracks" book are being considered. They suggest the addition of the Great Glen Canoe Trail to this Environmental Context as it is another of the Scotland's Great Trails network as designated by SNH.

SEPA have highlighted key issues that must be addressed in the EIA process. SEPA advise that in order to avoid delay and potential objection the information outlined in the response letter and in the attached annex to their response must be submitted in support of the application.

SNH have highlighted that in addition to the issues and interests which were covered by the previous Environmental Impact Assessment, new policies have been adopted in relation to impacts on carbon rich soils, deep peat and priority peatland habitats and impacts on wild land areas. To guide the applicant, SNH have provided detailed comments on what should be considered during the EIA process in annex A of their response letter attached at appendix 1

Transport Scotland consider the inclusion of an updated construction noise assessment and a revised assessment of the potential effects on traffic and transport from the construction and operation of the new proposal to be included in the EIA report to be acceptable.

Visit Scotland strongly recommend that a tourism impact assessment be carried out as part of the EIA process.

This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at today's date. Nothing in this written scoping opinion will prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

3. Duration of Scoping Opinion

Without prejudice to that generality, it is recommended that an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within twelve months of the date of this opinion.

4. Process Going Forward

It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. All applicants are encouraged to engage with officials at the Energy Consents Unit before proposals reach design freeze. This will afford an opportunity for additional comments to be provided on the final proposals at pre-application stage.

Applicants are reminded that there will be limited opportunity to materially vary the form and content of proposed development post submission.

When finalising the environmental impact assessment report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5. Consultation Responses

All consultation responses received should be addressed in full and Scottish Ministers expect the information outlined in this scoping opinion and in the annex of consultation responses appended to this scoping opinion to be included in the EIA report to support the application. Copies of the responses received from the consultees are attached at Appendix 1

Theresa McInnes
Energy Consents Unit

Authorised by the Scottish Ministers to sign in that behalf.

Appendix 1
Consultation Responses

McInnes T (Theresa)

From: Andy Mills <andymills@amgeomorphology.co.uk>
Sent: 05 June 2017 14:50
To: McInnes T (Theresa)
Cc: McKenzie JR (James)
Subject: Coire Glas Hydro Pumped Storage II

Dear Theresa,

Thank you for providing the opportunity to review the Scoping Report for the revised Coire Glas Hydro Pumped Storage Scheme. We note from the Scoping Report that deep peat (up to 2.0m) is present within the dam footprint and in pockets of 1.0 – 1.8m along the access track. We also note from the non-technical summary for the original scheme that there is the potential to re-use peat excavated during construction, though full details are limited to the ES for the previous scheme to which we do not have access at this point.

The recently reissued Scottish Government *"Peat Landslide Hazard and Risk Assessments: A Best Practice Guide for Proposed Electricity Generation Developments (Second Edition)"* states that *"Most Section 36 applications will be assessed in relation to their potential to generate peat landslide risks. Exceptions would be those sites where there is no peat or where peat is highly localised and demonstrably outwith areas proposed for infrastructure."* In the case of the proposed Coire Glas scheme, while peat is localised, it is *within* areas proposed for infrastructure and therefore there is the potential for peat instability to be generated during construction (both at the point of extraction and in association with storage locations).

In our opinion, the risks associated with peat instability should be addressed given the proximity of the Allt a' Choire Ghlais and connectivity of this watercourse to Loch Lochy (with its associated fisheries interests). The assessment should be in the form a full peat landslide hazard and risk assessment, as outlined in the reissued Best Practice Guidance above.

If you have any queries, please do not hesitate to get in touch.

Best regards,

Andy

Dr Andy Mills
Geomorphologist

Tel: +44 7943 875773
Mail: andymills@amgeomorphology.co.uk
Web: www.amgeomorphology.co.uk

McInnes T (Theresa)

To: McInnes T (Theresa)
Subject: FW: Revised Coire Glas Hydro Pumped Storage I

From: dale.aitkenhead@openreach.co.uk [mailto:dale.aitkenhead@openreach.co.uk] **On Behalf Of** radionetworkprotection@bt.com
Sent: 22 May 2017 09:41
To: McInnes T (Theresa); Econsents Admin
Subject: RE: Revised Coire Glas Hydro Pumped Storage II

Dear Sir/Madam

Thank you for your email.

We have studied this proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that the project should not cause interference to BT's current and presently planned radio networks.

Regards

Dale Aitkenhead
Radio Frequency Allocation & Network Protection
Openreach
Tel: 0191 2696372 Mobile 07540897558 Web: www.openreach.co.uk

Forestry Commission Scotland
Coimisean na Coilltearachd Alba

Highland and Islands Conservancy
"Woodlands", Fodderty Way
Dingwall, Ross-shire, IV15 9XB

Glèidhteachas na Gàidhealtachd's nan Eilean
"Fearann – coilleach"
Rathad Fodderty
Inbhir Pheodhearan
Sgire Rois, IV15 9XB

Tel/Fòn 0300 067 6950
highland.cons@forestry.gsi.gov.uk

Conservator/Neach Dion Arainneachd
John Risby

Theresa McInnes
Energy Consents Unit
The Scottish Government

09 June 2017

Dear Theresa McInnes

The Electricity works (Environmental Impact Assessment) (Scotland) (EIA) Regulations 2000, for the revised Coire Glas Hydro Pumped Storage Scheme.

Introduction

This document represents Forestry Commission Scotland (FCS) views on the proposed revision of the Coire Glas Pumped Storage Scheme, as described in the Scoping Report for the project**.**

Background

FCS supports the Scottish Government's commitment on renewables. FCS is the Scottish Government's (SG) competent authority on forests and woodlands. As such, FCS advises on the evaluation of development proposals when they may have an effect on a woodland environment.

FCS Assessment of the Scoping Report in relation to woodland

FCS acknowledges the consideration of changes to the woodland structure, resulting in possible loss of woodland area. An analysis will need to be done to determine the area of woodland loss and how this fits with The Control of Woodland Removal Policy and compensatory planting that this will likely require. The implications of restructuring on the landscape and stability of the woodland remaining will also have to be considered.

The key to this is in the Forest Design Plan for the area and the restocking proposals for the site.

Any compensatory planting outside the current planning area would be subject to The Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. These can be found here http://scotland.forestry.gov.uk/supporting/grants-and-regulations/environmental-impact-assessment

It is difficult to ascertain from the scale of the map, however the Temporary Site Accommodation/Site Establishment Area shown indicatively in Figure 1 requiring the removal of coniferous forestry appears to be located on a Plantation on Ancient Woodland Site (PAWS) and the locations are identified on the Native Woodland Survey of Scotland (NWSS). Consideration should be given when deciding on the actual location of the Construction Compounds to avoid disturbance to PAWS and Native Woodland. Further information will be required as to the reinstatement of these sites post construction should they be situated within a woodland setting.

As they appear in Figure 1 the location of the Outlet area: Tailrace and Jetty & Administration Building will have an impact on Native Woodland identified on the Ancient Woodland Inventory (AWI) and the NWSS. Further information will be required on how disturbance is likely to affect this UK Biodiversity Action Plan (UKBAP) Priority Habitat.

Policy relevance**:** Conservation of Ancient Semi-Natural Woodland (ASNW) and restoration of the biodiversity of plantations on ancient woodland sites are priorities in the Scottish Forestry Strategy and Scottish Biodiversity Strategy. Scottish Planning Policy recognises the high value of ancient woods and semi-natural woodlands for nature conservation.

Section 6.5 of the Scoping Report mentions the presence of Juniper a UKBAP priority species. Biosecurity measures should be implemented when working in the vicinity of Juniper to prevent the spread of *Phytophthora austrocedri (P. austrocedri*). *P. austrocedri* is a fungus-like pathogen which poses a threat to juniper trees in Britain. Further information can be found at https://www.forestry.gov.uk/paustrocedrae

Conclusion

FCS would welcome the inclusion of a forestry assessment and chapter as part of the EIA. Woodland removal is likely to result in a requirement for compensatory planting for an area yet to be determined. FCS would seek that this was a condition of approval and that compensatory planting had to be in place prior to construction commencing.

FCS would be happy to work with the developers as plans progress. I also enclose a copy of FCS generic scoping opinion for further information; although the document is mainly directed at windfarm developments many of the points are relevant to the Coire Glas Pumped Storage Scheme.

If you have any queries on this advice please do not hesitate to contact me.

Yours sincerely

Martin MacKinnon
Regulations & Development Manager
martin.mackinnon@forestry.gsi.gov.uk

HISTORIC ENVIRONMENT SCOTLAND | ÀRAINNEACHD EACHDRAIDHEIL ALBA

By email to: EconsentsAdmin@gov.scot

Theresa McInnes
Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131-668-8716
HMConsultations@hes.scot

Our ref: AMN/16/H
Our case ID: 300020631

06 June 2017

Dear Ms McInnes

The Electricity Works (Environmental Impact Assessment)(Scotland) Regulations 2000
Revised Coire Glas Pumped Storage Scheme
Scoping Report

Thank you for your consultation which we received on 16 May 2017 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

I note that the proposed development is a revised proposal of an already consented scheme on site for a hydroelectrical pumped storage scheme at Coire Glas, which obtained consent in 2013.

I understand that the proposed development comprises of a hydroelectric pumped storage scheme at Coire Glas, which will comprise of a dam and reservoir, an underground power station, headrace and tailrace tunnels, trail race outfall and access tracks (both temporary and permanent), laydown areas and workers camps.

The proposed development will increase the generating capacity of the project from 600MW to up to 1500 MW. This will require an increase in size of the underground

waterway system and power station compared to The Consented Development, a potentially larger tail race footprint, the potential inclusion of a new surge shaft (with associated access) and surface intake tower, a greater flow rate of water and larger quantities of rock requiring disposal.

Scope of assessment

Direct Impacts

We note that a section of the existing access tracks to be upgraded are located within the inventory battlefield designation Blar na Leine, (BTL29). We note that it is proposed that the existing Great Glen Way and forestry track (the same track) will be upgraded to be used by construction and other associated vehicles. A parallel path is also proposed for walkers and cyclists along this section of the route creating a permanent diversion of the Great Glen Way, with the proposed development using the existing track as access to the site.

The Scoping Report states that an updated assessment of cultural heritage, with an updated assessment the proposed development on the battlefield to be included in the Environmental Statement. We are content with this approach.

I can confirm that there are no scheduled monuments, category A listed buildings, gardens and designed landscapes or historic marine protected areas (HMPAs) within the proposed development site.

Indirect Impacts

There are two scheduled monuments located within the Blar na Leine battlefield designation (BTL29) which are located nearby the proposed upgraded access tracks running through the battlefield. The Caledonian Canal Laggan Lochs, SM5295 and the Caledonian Canal Laggan Locks to Loch Oich, SM6494 are located within close proximity to the upgrades to the existing access and creation of a new path.

However, in light of the nature of the proposals in this area, we are content that significant impacts on the scheduled monuments and its settings are unlikely due to the nature and the intervening distance between the proposed development and scheduled monuments.

General Comments

Overall, we are broadly content with the methodology and approach to the cultural heritage assessment as set out within the Scoping Report. I would recommend that consultation with the local authority's archaeology and conservation advisors, as they will

also be looking at these potential impacts for the above interests (as well as issues beyond our remit, such as unscheduled archaeology and B and C listed buildings). They may have additional requests for information or the scope of the assessment.

Detailed guidance on the application of national policy is set out in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes/. Technical advice is available through our Technical Conservation website at http://conservation.historic-scotland.gov.uk.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Anna Gaffney and they can be contacted by phone on 0131 668 8653 or by email on anna.gaffney@hes.scot.

Yours sincerely

Historic Environment Scotland

The Highland Council
Comhairle na Gàidhealtachd

Theresa McInnes
Senior Case Officer
Energy Consents Unit
Scottish Government
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow G2 8LU

Please ask for: Ken McCorquodale

Direct Dial: 01463 702256

Our Ref: 17/02403/SCOP

Date: 6 June 2017

Sent by e mail in word format to:

- Theresa.Mcinnes@scotland.gsi.gov.uk
- econsentsadmin@scotland.gsi.gov.uk
- Watt.jamie@sse.com

Dear Ms McInnes,

ELECTRICITY ACT 1989 & THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2000.

SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR THE REVISED COIRE GLAS PUMPED STORAGE SCHEME.

I refer to your e mail consultation of 16 May 2017 regarding the above proposal and in particular the request for input to the revised project - scoping exercise.

The Council has received a package of information direct from SSE. A briefing was also given by their project team led by Andy Gregory, Jamie Watt and their consultant Andrew Curds.

By way of background this is a revised scheme to the one already consented by Scottish Ministers, which was supported in full by the Highland Council. The Council was involved with the drafting of planning conditions that were used by Scottish Ministers for that earlier project. Accordingly we were quite comfortable with the approved proposal.

It is noted with this project that: -

- The scheme is not significantly different to that already approved.
- The potential power output has increased. This is achieved by a faster down-hill throughput of water through the mechanics, rather than an enlargement of the dam capacity.
- A bigger underground cavern is required and thereby increased surplus rock is generated at the construction stage.
- It requires an enlarged lower tailrace / outlet structure to maintain a small impact on Loch Lochy.
- An additional vent / surge shaft, the construction of which will require an extensive new

access track, not previously required.
- Changed routing of the tracks to the dam - through the initial forest section may be advanced for forestry management reasons.

Given the above, largely as presented within para 3.2 of the SSE Scoping Report, the Council has no significant concerns over the amended project.

The key matter as always with this project is the issue of surplus rock disposal from the excavations to the surrounding area, on which few if any details are provided. It is likely that any rock disposal will have its own planning requirements, including EIA assessment, and this needs to be determined in advance of any significant commencement of the principle renewable energy project currently being re-scoped. The increased power output will also place demands on the local grid network, the implications and consequents of which have also been parked outwith this scoping exercise!

With regard to the revised proposals currently being scoped, the Council would highlight that the Development Plan has been advanced, but not in a way that is hugely significantly for this amended project.

The key changes for this area arise more from Scottish Planning Policy as published in June 2014, which has advance the debate on areas of wild land and the safeguards for peatland.

The relevant Development Plan documents / Policies are as follows: -

Highland-wide Local Development Plan (adopted in April 2012)

Policy 28 - Sustainable Design
Policy 29 - Design Quality & Place-making
Policy 30 - Physical Constraints
Policy 31 - Developer Contributions
Policy 51 - Trees and Development
Policy 52 - Principle of Development in Woodland
Policy 55 - Peat and Soils
Policy 57 - Natural, Built & Cultural Heritage
Policy 58 - Protected Species
Policy 59 - Other important Species
Policy 60 - Other Importance Habitats
Policy 61 - Landscape
Policy 63 - Water Environment
Policy 64 - Flood Risk
Policy 65 - Waste Water Treatment
Policy 66 - Surface Water Drainage
Policy 67 - Renewable Energy Developments
Policy 68 - Community Renewable Energy Developments
Policy 69 - Electricity Transmission Infrastructure
Policy 72 - Pollution
Policy 77 - Public Access
Policy 78 - Long Distance Routes

West Highland and Islands Local Development Plan (as continued in force)

No relevant policies.

West Highlands and Islands Local Development Plan (Proposed Plan) (5 May 2017)

No relevant policies.

Highland Council Supplementary Planning Policy Guidance

- Developer Contributions (March 2013).
- Flood Risk & Drainage Impact Assessment (Jan 2013).
- Highland Historic Environment Strategy (Jan 2013).
- Highland's Statutorily Protected Species (March 2013).
- Highland Renewable Energy Strategy & Planning Guidelines (May 2006).
- Physical Constraints (March 2013).
- Special Landscape Area Citations (June 2011).
- Standards for Archaeological Work (March 2012).
- Sustainable Design Guide (Jan 2013).
- Trees, Woodlands and Development (Jan 2013).

Other Planning Advice and Guidance

In addition to development plan policies the Council has other policies and guidance material which can be useful to applicants, especially those preparing EIA assessments. This includes for example THC's Visualisation Standards for Wind Energy Developments have been produced to help you produce images that accurately support planning applications, including for non wind farm projects. We have developed a single frame viewer for the accurate visual impact assessment of panoramic images. The consultant's associated with this project are aware of this guidance and may care to use them within any submission. The earlier application was let down, with the use of watercolours as visual aids, when presenting the details of likely visual impact to Members of the Planning committee.

Other relevant advice and guidance includes: -

- Construction Environmental Management Process for Large Scale Projects (August 2010).

Considerations

The initial application for this project was largely considered within the context of the same plan, the Highland Wide Local Development Plan, therefore from its perspective the Council would be content to accept that the earlier Development plan policy assessment presented for the initial project would be sufficient for the current proposal. This is said fully recognising that Scottish planning policy has changed, through the publication of SPP. This is expected to require the amending application to take into account the changes particularly with regard to comments expected to be provided to you by SNH (wild land) , SEPA (peatlands) and the Forestry Commission (trees / woodland impacts).

The Council as roads authority has a keen interest in this project and in particular it impact on the local road network. It will be necessary that any application be updated in respect of its potential impact on the Council's road network and what level of mitigation is proposed.

It is hoped that on this occasion a more exact explanation / traffic impact assessment will be provided in respect of surplus rock removal. It was previously highlighted that a preference would be to export the rock by canal barrage. Whilst such an approach has its appeal, any continued suggestion for this option needs to be grounded in more detail provisions to inform

the assessment of the proposal and any offered mitigation.

The above commentary highlights uncertainty in respect of rock removal and rock disposal. These raise concerns in respect of construction noise and the potential of dust pollution. These are matters previously highlighted within the earlier project. It will be important that any future application recognises the potential increased issues that need to be managed by planning conditions and the importance of baseline information being available in respect of current noise levels, etc. In this regard there are a number of properties that will be significantly impact by the development, particularly on the approach road to the lower tunnel outlet. The impact is not just on residential impact, but also the current quiet rural amenity that forms the basis of many tourist related activities. It is hoped that any assessment of these matters is well grounded to enable a fair and reasonable determination of a future application.

If you require any further information please do not hesitate to get in touch.

The Council would be happy to offer its pre application planning service to ensure a collective discussion is had on the emerging revised project.

Yours sincerely

[redacted]

Ken McCorquodale
(Principal Planner – Dev Management HQ)

McInnes T (Theresa)

From: Anne Phillips <APhillips@hial.co.uk>
Sent: 30 May 2017 13:29
To: Econsents Admin
Cc: jamie.watt@sse.com
Subject: Revised Coire Glas Pumped Storage Scheme: Environmental Scoping Report

Your Ref: Coire Glas Pumped Storage Scheme
HIAL Ref: 2017/0083/INV

Dear Sir/Madam,

PROPOSAL: **Coire Glas Pumped Storage Scheme: Environmental Scoping Report**
LOCATION: **SW of Invergarry**

With reference to the above proposed development, it is confirmed that our calculations show that, at the given position and height, this development would not infringe the safeguarding surfaces for **Inverness Airport.**

Therefore, Highlands and Islands Airports Limited would have no objections to the proposal.

Regards

Safeguarding Team
Highlands and Islands Airports Limited
Head Office, Inverness Airport, Inverness IV2 7JB
☏ 01667 464244 (DIRECT DIAL)
✉ safeguarding@hial.co.uk 🖷 www.hial.co.uk

McInnes T (Theresa)

From: JRC Windfarm Coordinations <windfarms@jrc.co.uk>
Sent: 23 May 2017 15:07
To: McInnes T (Theresa)
Subject: Revised Coire Glas Hydro Pumped Storage II [WF920734]

Dear theresa,

A Windfarms Team member has replied to your coordination request, reference **WF920734** with the following response:

Dear Sir/Madam,

***Site Name**: Coire Glas Pumped Storage Scheme, Invergarry, Highland*

***Turbine at NGR**: n/a*

***Hub Height**: n/a **Rotor Radius**: n/a*

***Scope:** Increase capacity of consented scheme to 1500MW*

***Location:** Approximate site centre at ngr 224580 794320*

*This proposal ***cleared*** with respect to radio link infrastructure operated by:*

The local electricity utility and Scotia Gas Networks

JRC analyses proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal. Please note that due to the large number of adjacent radio links in this vicinity, which have been taken into account, clearance is given specifically for a location within the declared grid reference (quoted above).

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, you are advised to seek re-

coordination prior to submitting a planning application, as this will negate the possibility of an objection being raised at that time as a consequence of any links assigned between your enquiry and the finalisation of your project.

JRC offers a range of radio planning and analysis services. If you require any assistance, please contact us by phone or email.

Regards

Wind Farm Team

The Joint Radio Company Limited
Dean Bradley House,
52 Horseferry Road,
LONDON SW1P 2AF
United Kingdom

TEL: +44 20 7706 5199

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.
Registered in England & Wales: 2990041
http://www.jrc.co.uk/about-us

We hope this response has sufficiently answered your query.
If not, please **do not send another email** as you will go back to the end of the mail queue, which is not what you or we need. Instead, **reply to this email keeping the subject line intact or login to your account** for access to your coordination requests and responses.

https://breeze.jrc.co.uk/tickets/view.php?auth=o1xyacqaaebemaaaqQM%2BvQCb6zX%2FRA%3D%3D

McInnes T (Theresa)

From:	Jon Gibb <jongibb123@gmail.com>
Sent:	17 May 2017 14:36
To:	Econsents Admin
Subject:	Lochaber DSFB - response to Coire Glas revised scoping exercise - sent by post also
Attachments:	response to Coire Glas CAR application (2016_04_18 16_49_34 UTC).docx; response to Coire Glas application Feb 2012 (2016_04_18 16_49_34 UTC).docx

Dear Sir/Madam,

Revised Coire Glas Pumped Storage Scheme – Response to Environmental Scoping Report

Thank you for forwarding the Scoping Report for the above revised proposal. We responded fully to the previous application for this scheme and our comments throughout that former process still apply under this revised proposal.

The primary difference we note with this revised proposal is the increased generating capacity which will result in an increase in the *rate* of fluctuation in Loch Lochy levels.

The Lochaber DSFB is the statutory body for the protection of salmon and sea trout in the Lochaber region. It will be incumbent upon us to make sure that this new proposal does not significantly affect these species. The former proposal had this negative potential (and many of our concerns remained unaddressed throughout that process) and the fact that this new proposal could increase the hydrological downstream risk to these species due to the more rapid fluctuations of the loch is of great concern. For reference, I have attached the responses we gave through the process of the original proposal which should be referred to as the fundamental issues have not changed.

For the avoidance of doubt – any environmental assessment prior to a formal application being made for this scheme should address the following –

1. Specific details on how flow management will be managed at Mucomir Barrage so as to deliver an assimilated natural run off to the Rivers Spean and Lochy downstream. The delivery of water downstream of Loch Lochy has at times created serious environmental problems in the River Lochy (see documented evidence in previous responses relating to fish kills) and the increase in loch fluctuation could make this

situation much more acute. How will this be properly addressed in the pre-application environmental assessments?

2. What structure and mechanism will be left in place at Mucomir Barrage to manage flow, and will this be part of the overall planning application and CAR Licence?

3. What fish passage arrangements will be put in place at Mucomir Barrage?

4. How will the potential impacts downstream on the business interests of the salmon rod fishery on the River Lochy (owned and managed by the River Lochy Association) be assessed in the pre-application assessments? Unnatural fluctuations in river levels can be highly detrimental to the success of the rod fishery (see previous application comments) and this fishery, as the largest salmon fishery on the West Coast of Scotland, is a major contributor to the local Fort William economy.

5. How are the risks of rapid water level fluctuation on the large salmon farm on Loch Lochy run by Marine Harvest Scotland being assessed, and have they been consulted at an early stage about these proposals and how they may affect the management and bio-security of their cages?

6. How will the rapid fluctuations be managed with regards the delicate water level management of the Caledonian Canal and the traffic using it, and have British Waterways been consulted at an early stage?

7. How are the changes in fish habitat and food availability within the loch margins being assessed under these new proposals? (The DSFB has a role in protecting salmon and sea trout but the Lochaber Fishery Trust will no doubt respond with regards to all other freshwater species.) Any loss in productivity to the local trout population could have a negative impact on the local migratory sea trout population.

We look forward to the above matters (and those addressed in the attached former responses) being addressed fully in any pre-application assessments. For the avoidance of doubt and to fulfil our statutory role, we would need to be satisfied that these matters are fully addressed before any planning or CAR application is made. Notably, this did not appear to be the case during the previous application process.

Yours faithfully,

Jon Gibb, Clerk.

Lochaber District Salmon Fishery Board

Fuaim Na Mara

Morar

Invernesshire

PH40 4PD

Tel 07786 493048

THE LOCHBER DISTRICT SALMON FISHERY BOARD

Clerk to the Board: Jon Gibb.

5 Lochy Crescent, Inverlochy, Fort William, PH33 6ND
Tel 07786 493 048
email: ldsfb@btconnect.com

24th February 2012.

Dear Sir/Madam,

SECTION 36 APPLICATION FOR THE PROPOSED COIRE GLAS PUMPED STORAGE SCHEME NW OF LOCH LOCHY.

Thank you for the invitation to respond to the above application. We are doing so having considered the Environmental Statement forwarded to us by the developers Scottish and Southern Energy.

The Lochaber DSFB recognises the importance of this development, particularly in the future efficient delivery of electricity requirements. We have also been involved in meetings prior to the publication of the Environmental Statement with both SSE and their agents ASH Design and Assessment.

During one of these meetings - December 15th 2010, Fort William where the following were present Jon Gibb Lochaber DSFB (JG), Alastair Stevens SSE (AS) Neil Lannen ASH (NL), Andrew Curds ASH (AC), Jon Watt Waterside Ecology (JW), Diane Baum Lochaber Trust (DB) - it is minuted :

> 8. JG queried impact on wider hydrology / water management issues and how this would be addressed in ES. NL advised that it is currently envisaged that the Coire Glas scheme would operate within the existing loch level ranges. Therefore no change to the existing loch levels are anticipated, but the frequency of fluctuations would increase. Water management as a whole (including cumulative issues) is an issue under consideration with SSE at present and will be explored fully within the ES. Included within this consideration will be the viability of the operational Mucomir hydroelectric plant should consent for the Coire Glas scheme be granted.
>
> 9. JG queried whether a hydrological model to demonstrate the potential impacts of the scheme on hydrology had been produced. SSE to discuss this with SEPA and EIA team. JW suggested a useful exercise would be for JW / AS / JG / DB to compile a briefing note detailing the key issues and potential mitigation measures associated with the proposed scheme in relation to fish / fisheries interests within Loch Lochy and the wider catchment.

Following on from bullet point 9, Alastair Stevens of SSE compiled a list of the potential impacts of the proposed pumped storage scheme in relation to fish/fisheries interests. It included the following (my highlighting):

- On occasions the operation at Mucomir has caused fluctuation in river levels such that gravel bars and backwater sections of the mainstem of the river have been dewatered resulting in the loss of juvenile salmon and trout. This despite SSE's best efforts in managing the changes in flow at Mucomir. The latest incident that occurred in autumn 2009 (which resulted in the death of thousands of salmon fry and parr) was fully investigated by SSE / SEPA /Fisheries and the conclusion was that SSE was operating within its CAR licence. In addition, the way the floodgates were used and the timings of operation were precisely in accordance with the agreed procedure. The issue is still live.
- **It is possible that dewatering problem might be exacerbated by a pumped storage facility in the catchment upstream. A key area for the EIA is to look at modelling the flows under different runoff conditions with the pumped storage facility operating**; whilst fully incorporating the constraints on water flow management at Mucomir at the moment; capabilities of the main machine, the capacity of the comp set and how and when this is used in relation to the main machine and the capacity and current operating capabilities of the floodgates, for not only dealing with floods but maintaining river flows at the other end of the hydrograph.

The picture below illustrates what can happen when the River Lochy downstream of this proposed development becomes rapidly dewatered – thousands of young salmon and trout are killed. As the above confirms, the particular incident is still 'live'.

Pictures – October 2009 fish kill on the River Lochy.

We do not believe that sufficient attention has been paid in the Environmental Statement to the main impact of this proposed scheme – the alteration of the downstream hydrological profile in the River Lochy. Further, we do not believe that a proper assessment of the true environmental impact of the scheme can be assessed until proper hydrological modelling has been undertaken under differing run off scenarios. This of course will require SSE to decide the design of any facility that is to be installed at the location of the current Mucomir Power Station. The operation of the pumped storage scheme and the operation of the Mucomir facility are intrinsically linked and must be considered together when assessing what the true impact of the Pumped Storage Scheme will be.

The above mentioned document produced by Alastair Stevens of SSE goes on to say (my highlights):

1. Fishery issues

> The issue highlighted above of rapidly changing flows in the River Lochy downstream of Mucomir has not only potential damaging consequences for the young fish and the rest of the aquatic ecology, but can affect the rod and line fishery to an extent. The changes in flow (unless catastrophic in nature) will not have any significant effect on the adult salmon and sea trout, however rapid changes in discharge has been shown to potentially alter the effectiveness of rod and line fisheries. The River Lochy has a well run and fully booked fishery which generates a significant amount of income to the rural economy throughout eight months of the year. **Any exacerbation in fluctuating river flows due to the proposed pumped storage facility will have potential negative impacts on the fishery downstream and this needs to be factored into any forthcoming economic as well as environmental assessment.**

We can see no specific mention of this critical issue in the Environmental Statement, in spite of the SSE fisheries biologist highlighting it, and for that reason we do not believe that the issue has been given any heed at all in spite of this being one of our key concerns at pre-consultation meetings.

Section 4.3.6 in the ES alarms us further. It states –

> Although the present maximum and minimum loch levels would not change, variations in Loch Lochy level between these limits could be expected to be more frequent. It is not possible to construct accurate Loch Lochy level duration information at this stage as the operation of the Development would be in response to future electricity markets.

It would, in our opinion, be entirely wrong to grant consent for the operation of this scheme without some degree of appraisal of the future likely downstream hydrological profiles and durations etc., even if there are some limiting factors to entire accuracy due to unknown future power requirements. *We urge the Scottish Government to request this of the developers prior to consent being considered.*

We are more encouraged by Secion 4.3.4 in the ES which states –

> Improvements to Mucomir barrage would generally comprise measures to allow steady and controlled flow release to the River Lochy over long periods. When changes in flow were required these would be implemented gradually at rates to be agreed. The flow released from Mucomir power station would be determined on the basis of total water held in both Loch Lochy and the new storage reservoir at Loch a" Choire Ghlais and would not vary with Loch Lochy level oscillations due to the operation of the pumped storage plant. It is anticipated that the addition of a significant extra water storage capacity to the Loch Lochy system would also provide benefits to downstream flow during prolonged dry periods.

However this statement is scant of any detail at all and we contend that any Environmental Statement should consider this. As stated above we understood from the December 15th meeting that the 'water management as a whole will be explored in the ES'. We do not believe that this has happened in any detail at all.

Finally, at the same aforementioned meeting it is minuted-

> 11. JG asked whether the fish farm on Loch Lochy had been consulted yet. AC advised not but confirmed this will be undertaken.

We note from the ES that the level in Loch Lochy may fluctuate very regularly 1.57m every 50 hours. While this may not be hugely outwith the bands of the loch's normal fluctuations, the time duration and regularity would be entirely unnatural. There is a very large salmon farm operated by Marine Harvest (NOT a rainbow trout farm as stated in the ES) at the southern end of the loch. We would be concerned about both the welfare of the fish and the extra strain put on mooring ropes etc. as a result of these rapid fluctuations. Stress on farmed fish can result in elevated disease outbreaks and foreign genetic introgression can occur when worn equipment results in fish farm escapes.

We would urge that firstly the fish farm company is consulted (it is unclear whether ASH did so following the 2010 meeting) and secondly the matter is addressed fully prior to consent being considered by the Scottish Government.

We trust that the above issues will now be addressed as part of this application process.

Yours sincerely,

JON GIBB
Clerk to the Board.

Lochaber Fisheries Trust Ltd

Registered Office: Torlundy Training Centre, Fort William, Inverness-shire PH33 6SW
Biologists - Dr Diane Baum, Lucy Ballantyne
Telephone: 01397 703728 **E-mail**: lochaberfisheriestrust@gmail.com
Scottish Registered Charity No. SC 024 490
A Company Limited by Guarantee. Company Registration Number: 261 988

Energy Consents Unit
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31st May 2017

Dear Sir or Madam,

Revised Coire Glas Scoping Report

Scottish and Southern Energy (SSE) invited the Lochaber Fisheries Trust (LFT) to comment on their Revised Coire Glas Scoping Report. We are grateful for this opportunity to identify potential issues relating to fish populations and freshwater habitats that could arise from the proposed scheme.

Our two main concerns are:

1. The effect of fluctuating water levels in Loch Lochy on fish spawning and foraging activity
2. The impact of the scheme's operation on water flows in the River Lochy.

In addition, the scheme will have a significant and permanent effect on Loch a' Choire Ghlais and the Kilfinnan Burn, which we feel has been well assessed in the previous EIA. The construction phase of the project also has the potential to affect water quality, but we would expect best-practice measures to be put in place to minimise this risk.

1. Fluctuating water levels in Loch Lochy

Loch Lochy supports populations of trout (both sea and brown trout), Arctic charr and Atlantic salmon. As in most large, oligotrophic lochs, the most productive fish foraging habitat is found in a relatively narrow area around the loch margin where light is able to penetrate and drive primary production. The loch margins are also likely to be used by spawning fish, and both trout and salmon are known to spawn in the burns running into Loch Lochy. Rapid fluctuations in the height of lochs caused by the operation of large hydro schemes degrade the quality of habitat along the loch margin and can prevent fish gaining access to spawning tributaries. There is no drawn-down zone currently visible along the shore of Loch Lochy, probably due to the relatively small and slow changes in water height relative to other dammed lochs.

The report states that the new operating regime would result in loch levels that remained within the 1.68m range currently licensed by SEPA. However, the speed as well as the amplitude of change is important in determining the impact and no information is provided about the frequency at which water levels will fluctuate within the stated range under the proposed new operating procedure. We would ask that the EIA includes detailed modelling of changes in loch levels and assesses the impact this will have on loch margin habitats. The area of fish spawning and foraging habitat lost or degraded due to water height fluctuations should be

estimated and the effect of water level changes on the accessibility of the River Arkaig and tributary burns for migrating fish should be assessed.

2. Water flows in the River Lochy

The River Lochy is the most important salmon river in Lochaber and one of only a few rivers on the west coast capable of supporting a commercial salmon fishery. Water flows in the River Lochy are currently affected by hydro schemes operated by SSE and Liberty Aluminium, and by Scottish Water's abstraction at Camisky Flats. Rapid falls in river level caused by the hydros have resulted in fish kills on the River Lochy in recent years and, though such dramatic effects are infrequent, there is probably an ongoing reduction in the availability and quality of salmon spawning and juvenile habitat in the catchment.

We would ask that SSE put forward a proposal on how water flows into the River Lochy are to be managed when the Coire Glas scheme is in operation. Such information was not included in the previous EIA and we feel that this issue does need to be addressed before the scheme is approved and not dealt with through conditions since the potential impact is so great and any solution may need to be integrated within the wider scheme.

If I can provide any further information about the points raised above, please do not hesitate to contact me.

Yours Faithfully,

Diane Baum

References

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Ministry of Defence

Defence Infrastructure Organisation

Theresa McInnes
Energy Consents Unit
5 Atlantic Quay
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Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
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31 May 2017

Your Reference: Coire Glas Hydro Scheme
Our reference: 10040110

Dear Theresa

MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)

Proposal:	To increase the generating/pumping capacity of the project from the consented 600 Megawatts (MW) up to around 1500MW to maximise the potential of the site.
Location:	Loch a' Choire Ghlais
Grid Ref:	233156, 803843

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.

I trust this adequately explains our position on this matter.

Yours sincerely

[redacted]
Debbie Baker

McInnes T (Theresa)

To: McInnes T (Theresa)
Subject: FW: Revised Coire Glas Hydro Pumped Storage II

From: Gardiner R (Ross) (MARLAB)
Sent: 06 June 2017 23:52
To: McInnes T (Theresa); Econsents Admin
Subject: RE: Revised Coire Glas Hydro Pumped Storage II

Dear Theresa

REVISED COIRE GLAS HYDRO PUMPED STORAGE: ENVIRONMENTAL SCOPING REPORT - MAY 2017

Thank you for seeking comment from Marine Scotland Science.

Section 6.8 relies solely on what is in the ES (2012). Unfortunately this did not document the presence in Loch Lochy of a population of Arctic charr, which is a species of high conservation interest, although there was mention of potential spawning habitat for Arctic charr. This omission was discussed in correspondence subsequent to the ES, along with matters related to ferox brown trout and to underwater noise during construction. MSS requests that SSE should look at this material and revise Section 6.8 as appropriate.

Please come back to me for any clarification.

Best wishes.

Ross

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RSPB Scotland

Theresa McInnes Senior Case Officer

Energy Consents Unit

The Scottish Government

By Email: Theresa.McInnes@gov.scot

Dear Theresa

17/02403/SCOP Revised Coire Glas pumped storage scheme Land At Coire Glas North Laggan

Thank you for consulting RSPB Scotland on the above request for a scoping opinion. Having considered the bird information and proposed mitigation in the submitted Environmental Scoping Report (ESR) we wish to make the following comment.

We note that the survey work conducted in 2010 highlighted the presence of golden eagle but it was presumed that the individual constituted a foraging bird that used the area infrequently. We can confirm that proven breeding occurred in 2015 when the area was surveyed as part of the 2015 golden eagle national survey. The proposed development is located less than 1 km away from, and in sight of, the eyrie. This breeding pair is not subject to regular annual monitoring , so it is not clear whether the eyrie is occupied every year.

Golden eagles are listed under Annex 1 of the Birds Directive (2009/147/EC) and Schedule 1 of the Wildlife and Countryside Act (1981) and this important conservation status must be recognised when considering these development proposals.The potential impacts on this species should be adequately covered in the environmental statement.

This is a particularly remote and undeveloped area and therefore the golden eagle pair holding this territory has a high chance of breeding successfully here. It would not be acceptable to disturb the birds during the breeding season as a result of construction operations. Appropriate mitigation should be proposed in order to minimise disturbance issues during the construction and during operational phases (including as a result of maintenance work). It is important that mitigation is presented in enough detail to adequately assess the proposals before the application is determined.

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The information and records for the golden eagle, along with other records of raptor species present in the area, can be obtained from Highland Raptor Study Group.

We are happy to meet the applicant's consultants on site to discuss the proposals in more detail and the potential impacts on nesting golden eagle.

If you require any further clarification on the above please do not hesitate to contact us.

Darrell Stevens

Conservation Officer
South Highland

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cc. Theresa.McInnes@gov.scot ; jamie.watt@sse.com

21.06.2017

Dear Sir/Madam

RE: Scottish & Southern Electricity Revised Coire Glas Pumped Storage Scheme II Scoping Opinion under Regulation 7 of the Electricity works (Environmental Impact Assessment) (Scotland) (EIA) Regulations 2000

Many thanks for the opportunity to comment on this ambitious, nationally significant project.

Scottish Canals (SC) has been in positive dialogue with Scottish & Southern Energy (SSE) since the first Coire Glas scheme in 2011 was proposed. We commented in 2013 on the potential impacts of the scheme on the Caledonian Canal operations, Scottish Canals' proposed small-scale hydro-scheme at Banavie and the multiple benefits of partnership working. More recently, SC and SSE have been developing a Collaboration Agreement to formalise this relationship.

With regard to the revised scheme, SC, as statutory operator of the Caledonian Canal, would welcome the consideration of the following environmental issues in relation to the SC's interests as part of the EIA process.

1. **Sustainable transport opportunities**

SC is keen to maximise the use of the Caledonian Canal to transport people, equipment and waste materials, in particular rock, to and from the site during the construction phase to reduce land based transport impacts. In support of Scottish Government's agenda to support sustainable transport in the area in the longer term, SC has an aspiration to use this as a springboard to promote future freight use of the canal and the development of transport infrastructure improvements (e.g. at Laggan and Inveroich Pier).

2. **Waste management**

Scottish Canals would welcome the opportunity to be involved as a key player in the proposed Rock Disposal plan to explore fully the transport of waste rock from the scheme and its use for construction projects on the Caledonian Canal. During the 5-year construction period, SC would encourage SSE to consider the sustainable use of dredged canal sediments for the ecological improvement of cleared land areas, including access tracks, under the appropriate exemptions from waste management licensing.

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3. Water Management and Hydrological Considerations: changed water flows and level impact on Caledonian Canal operations

SC is the statutory navigation authority in Loch Lochy and the Caledonian Canal. Water resourcing for the canal is authorised via a Controlled Activities Regulations (CAR) licence. SC requests a detailed consideration of the potential impacts in the revised hydrological assessment of the changed SSE operations at Mucomir, the loch water levels and flows, as well as rates of change, on the Caledonian Canal operations including safe navigation and use of boat moorings in Loch Lochy and the adjacent canal sections at Laggan and Gairlochy. SC would also wish our long-term proposal for a small-scale hydropower scheme (50kW, 400 litres/sec) at Banavie on the Caledonian Canal, sourcing water from Loch Lochy to be included in the assessment.

4. Ecology

SC has evidence that otters are active in the Laggan section of the Caledonian Canal. SC would like this to be included in the protected species surveys.

5. Noise and vibration

SC welcomes the proposal for a revised assessment of the potential effects on cultural heritage. SC would like the potential impact of construction noise and vibration to be included in the assessment, in particular any blasting or other excavation process impacts on canal operations, our staff and customers and the potential impacts on the integrity of the historic structures of the Caledonian Canal, which has scheduled monument designations.

6. Supply chain

SC welcomes the opportunity to be part of the local supply chain to help reduce the environmental impacts of the scheme. In particular, we are interested in the opportunity to provide local floating accommodation on the Caledonian Canal for the workforce during the construction phase.

7. Access

SC requests the full consideration of safe boat navigation in Loch Lochy and the adjacent sections of the Caledonian Canal and land access to the Great Glen Way and operational sites (Gairlochy and Laggan) during, and post, construction of the scheme.

As the project progresses, Scottish Canals wishes to continue to assist in maximising the benefits of the project to the Highlands through positive partnership working. SC looks forward to continued positive dialogue with SSE, through bipartite and multi-party meetings in the future to minimise impacts and maximise mutual benefits of the project.

Yours faithfully

[redacted]

Dr Olivia Lassiere, Heritage & Environment Manager, Scottish Canals

5 June 2017

Theresa McInnes
Senior Case Officer
Energy Consents Unit
The Scottish Government

By email to: Theresa.McInnes@gov.scot

SCOTTISH WATER
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EIA@scottishwater.co.uk

Dear Ms McInnes,

Revised Coire Glas Pumped Storage Scheme – EIA Scoping Opinion

Thank you for consulting with Scottish Water regarding the above.

Drinking Water Protected Areas

Scottish Water responded to a consultation for this development in 2013. As noted in our previous response, there are Scottish Water abstraction sources, the Camisky Boreholes, which are designated as a Drinking Water Protected Area (DWPA) under the Water Framework Directive, that may be affected by the proposed development.

The Camisky Wellfield abstracts from an alluvial aquifer on the banks of the River Lochy, downstream from Loch Lochy. The boreholes are drilled into the alluvial and glacial gravels within 100m east of the River Lochy. The groundwater has a strong hydraulic connection with the River Lochy and there is also a large surface water contribution from the River Spean, as it joins the River Lochy upstream of the site. Therefore any changes in flow to the River Lochy or the River Spean, near its confluence with the Lochy, could impact on the groundwater levels in the aquifer. Any water quality incidents arising from activity within the proposed development area which could impact Loch Lochy and, notwithstanding the impact of the dilution effect of the loch, the River Lochy downstream, could have an impact on the water quality of the boreholes.

We note the following statements from the Scoping Report submitted:

"The flow rate of water being transferred will be greater, but the maximum and minimum level limits of Loch Lochy will remain within the current limits…." (page 8)

"The operation of The Proposed Development would require the modification of Mucomir barrage and hydroelectric power station at Gairlochy. Control of Loch Lochy water levels is currently determined by the operation of Mucomir Power Station but the operation of a pumped storage scheme on the loch would take priority over Mucomir. As such, Mucomir Power Station would be modified and a new operating regime determined with the aim to provide improved fish passage and flow management of the River Lochy downstream" (pages 7-8)

"It is proposed to carry out detailed hydrological modelling as part of the ES to demonstrate and assess potential water management and wider hydrological impacts of The Proposed Development." (page 15)

It would appear that as a result of the revised scheme, the variations in water levels of Loch Lochy are expected to be more frequent and that the potential effects could be a change in outflow conditions from Loch Lochy. Accordingly, there may be an impact on the abstraction at Camisky Wellfield. The EIA should include an assessment of the potential impacts on this abstraction (including hydrological modelling results). As there is a strong link between flow/level in the river and groundwater levels at the Wellfield, Scottish Water would be concerned if there was a significant change to flows in the River Lochy, particularly under low flow conditions. We note that detailed hydrological modelling will be undertaken to assess the potential impacts of the proposed development on the Loch Lochy catchment. We ask that this assessment includes an impact on the Q95 flow and range of flows in the River Lochy upstream of the Camisky Wellfield at approximate NGR 216600, 782500. Please note that upon review of the modelling results, Scottish Water may request a further assessment of potential groundwater impacts.

Scottish Water has a duty to protect the security of its sources, particularly borehole locations which are not located on publicly available maps. We would therefore request that locational information with regard to the Camisky Boreholes is stated as confidential in the EIA and is not included in any documentation for publication. We would also ask that the detail of the hydrological assessment (with respect to the boreholes) is excluded from the published EIA and for the results of this assessment to be sent to Scottish Water only for review.

As noted in our previous response, it is essential that water quality and water quantity in the development area are protected. Annex 1 details a list of precautions and protection measures to be taken within DWPAs and the wider drinking water catchments.

Scottish Water Assets

The location of SW assets (including water supply and sewer pipes, water and waste treatment works, reservoirs etc.) should be confirmed by obtaining detailed plans from our Asset Plan Providers. Details of our Asset Plan Providers are included in Annex 1. If necessary, local Scottish Water personnel may be able to visit the site to offer advice. All of Scottish Water's processes, standards and policies in relation to dealing with asset conflicts must be complied with.

In the event that asset conflicts are identified then early contact should be made with the Scottish Water Asset Impact Team (AIT) at **service.relocation@scottishwater.co.uk**. All detailed design proposals relating to the protection of Scottish Water's assets should be submitted to the AIT for review and written acceptance. Works should not take place on site without prior written acceptance by Scottish Water.

In addition to the precautions and protection measures to be undertaken when works are to take place within a DWPA or drinking water catchment, Annex 1 also includes a list of precautions to be taken when working within the vicinity of Scottish Water assets. This list of precautions is not exhaustive but should be taken into account as the development progresses through the planning and development process.

It should be noted that the development will be required to comply with Sewers for Scotland and Water for Scotland 3rd Editions 2015, including provision of appropriate clearance distances from Scottish Water assets.

If you have any questions relating to the above, or in relation to the information presented in Annex 1, please do not hesitate to contact me.

Yours sincerely

Rebecca Williams
Strategic Planner – Environmental Impact Assessment

Annex 1: Precautions to protect drinking water and Scottish Water assets during hydro development construction and operational activities

General requirements

1. The proposed timing of the works, including planned start and completion dates, should be submitted to Scottish Water in advance of any activities taking place on-site. This information should be submitted to **EIA@scottishwater.co.uk.**

2. If a connection to the water or waste water network is required, a separate application must be made to the Scottish Water Development Operations Team for permission to connect. It is important to note that the granting of planning consent does not guarantee a connection to Scottish Water assets. The Development Operations Team can be contacted by telephone on **0800 389 0379** or via email at **developmentoperations@scottishwater.co.uk**.

3. In the event of an incident occurring that could affect Scottish Water we should be notified without delay using the Customer Helpline number **0800 0778 778** and the local contact if known.

Protecting drinking water quality

Regulatory requirements

4. Scottish Water is required to ensure that any activity within a drinking water catchment does not affect the ability of Scottish Water to meet its regulatory requirements.

5. Water Treatment Works are designed to treat the specific parameters of the raw water source they receive (i.e. the specific chemical, biological and other characteristics of natural, untreated water). If the characteristics of the raw water change or deteriorate, it can affect the ability of the works to supply drinking water to customers at the required standards.

6. The regulations relating to the quality of drinking water supplied by Scottish Water are the Water Supply (Water Quality) (Scotland) Regulations 2001. Quality Standards are derived from the European Drinking Water Directive 98/83/EC.

7. Drinking water catchments feed Scottish Water abstractions which supply water to water treatment works. Under Article 7 of the Water Framework Directive, waters used for the abstraction of drinking water are designated as Drinking Water Protected Areas (DWPA). The objective of the Water Framework Directive is to ensure that no activity results in the deterioration of waters within the DWPA. If an activity falls within a DWPA or drinking water catchment, it is essential that water quality and quantity are protected.

Specific precautions for drinking water protection during hydro scheme activities

8. A detailed, site specific Construction Method Statement including e.g. Construction Environmental Management Plan, Risk Assessment, Pollution Prevention and Contingency Plan must be submitted to Scottish Water at least three months prior to the works commencing. This should be agreed with Scottish Water prior to any operations taking place. Any other associated documents (e.g. Drainage Plan, Peat Management Plan etc.) should also be submitted and agreed with Scottish Water at least three months prior to works commencing. In the first instance, this information should be supplied to **EIA@scottishwater.co.uk**.

9. Where possible, infrastructure and activities should be located outside of the catchment area, with the exception of the intake, impoundment, tail race and sections of road and pipeline accessing the facilities. If this can be demonstrated to be impracticable then all infrastructure and activities should be located 100m from any watercourse where possible, and a minimum of 50m distant where 100m can be demonstrated to be undeliverable. This includes, access tracks, electricity connection and temporary construction related activities such as borrow pits, plant stockpiled materials, cement batching, wheel washing and construction compound areas

10. Any potential effect on the hydrology of the area resulting from the construction and operation of the proposed development should be assessed and the findings presented in the Environmental Statement/environmental appraisal accompanying the planning application. This should include an assessment of effects on natural drainage patterns, base flows/volume, retention/run off rates and potential changes to water quantity. Any required mitigation measures and proposed monitoring should also be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

11. When constructing roads, drainage ditches and trenches, drainage should not be directed into adjacent catchments but retained within the existing catchment.

12. Any potential pollution risk which could affect water quality should be considered and mitigation measures implemented to prevent deterioration in water quality and pollution incidents. This includes sediment run-off,

soil or peat erosion, management of chemicals and oils, etc. (see also point 18 below). This should be considered for operations at all stages of development including pre- and post-construction.

13. Mitigation measures to prevent pollution to watercourses should be outlined in the Environmental Statement or environmental appraisal accompanying the planning application and adopted in the Construction Method Statement/Construction Environmental Management Plan prior to work starting onsite. Any measures implemented should be regularly checked, maintained and improved if pollution occurs.

14. Consideration should be given to the use of food grade oils within turbines in close proximity to watercourses. The use of food grade oils within other plant and vehicles should also be considered depending on the risk to the drinking water catchment.

15. Watercourses that feed into any watercourses or reservoirs that Scottish Water abstracts from should be considered when developing new road or access infrastructure. Any crossing of these watercourses should be kept to a minimum. Pollution prevention measures should be put in place at each crossing point and silt traps, or equivalent, should be installed at regular intervals to minimise the risk from pollution.

16. Once constructed, site roads should be regularly maintained to ensure minimal erosion and hence run-off and pollution, from the road surface. Site roads should be constructed from inert, non-metalliferrous material, with low erodibility and low sulphide content.

17. No refuelling or storage of fuel or hazardous materials should take place within the drinking water catchment area. If this can be demonstrated to be impracticable, then the appropriate Scottish Environment Protection Agency (SEPA) Pollution Prevention Guidelines (PPG 2: Above ground oil storage, PPG 6: Working and Construction and Demolition Sites, PPG 8: Safe storage and disposal of fuel oils, PPG 21: Pollution incident response planning and PPG 22: Incident response – dealing with spills) should be followed. 50m buffers should be applied to all surface watercourses, groundwater borehole abstraction points and springs. Oil storage should be in accordance with The Water Environment (Oil Storage) Regulations (Scotland) 2006. There should be dedicated oil storage areas created. Spill kits should be located within all vehicles, plant and high risk areas.

18. Waste storage, concrete preparation and all washout areas should not be within the drinking water catchment area. If this can be demonstrated to be impracticable then this should be in dedicated areas 50m from a watercourse and designed to be contained and to prevent escape of materials/runoff to the environment.

19. Welfare/waste water facilities should preferably be located outside the drinking water catchment. If not practicable, then portable toilets should be used and waste disposed of off-site. Alternatively secondary treatment and soakaways should be used and, if required, a sampling chamber installed and sampling programme agreed. The proposed method of managing welfare and waste water facilities should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application. If sampling is required, Scottish Water should be contacted via **EIA@scottishwater.co.uk** in the first instance.

20. Any proposed abstractions for activities such as welfare facilities or cement batching plants should be detailed in the Environmental Statement or environmental appraisal accompanying the planning application.

21. Induction training should be given to all personnel on-site and should include Scottish Water site sensitivities in relation to drinking water catchments and assets (see below), as well as spill response as outlined in PPG 22: Dealing with spills.

22. Construction and Environmental Management Plans, Pollution Prevention and Contingency Plan and associated documents should include the Scottish Water Customer Helpline Number **0800 0778 778** and the local contact details.

Protecting drinking water in peatland areas

23. When peat is present within the proposed area of activity the Environmental Statement or environmental appraisal accompanying the planning application should include an assessment on the potential release of colour, dissolved organic carbon and total organic carbon as a result of changes to hydrology and/or physical disturbance. This should cover the construction and post-construction phases.

24. Excavations and ground disturbance in areas of deep peat should be avoided. Deep peat is considered to be peat greater than 0.5m deep.

25. The natural hydrology within peat should be maintained and/or restored. This should be taken into account when designing the access tracks, pipelines, power house, etc. Any necessary measures to maintain natural drainage of peat and sub-surface hydrology, such as tailored drain spacing on access tracks, should be implemented as part of the design of the development.

26. Scottish Water requests that, where possible, access tracks in the drinking water catchment are constructed as floating tracks with adequate provision for maintaining existing drainage patterns.

27. Exposed soils and peat can release sediment, colour and dissolved organic carbon. The use of geotextiles, turf replacement and/or reseeding, should be undertaken as soon as possible.

28. Restoration of any degraded peat should be considered for areas within the drinking water catchment.

Protecting drinking water due to forestry activity

29. An assessment of any forestry activity, including felling, planting or other activity, likely to affect the drinking water catchment should be included in the Environmental Statement or environmental appraisal accompanying the planning application. Any specific mitigation measures should be identified and incorporated into the Construction Environmental Management Plan for the site prior to works commencing.

30. The Environmental Statement or environmental appraisal accompanying the planning application should include details on the harvesting/clearance process for any felling/woodland removal. The least disturbing method/s should be selected where possible.

31. Any historic drains or ditches within the site boundary that discharge directly to a watercourse in the drinking water catchment should be blocked and slowly discharged to a buffer area in line with current Forestry Commission Forest and Water Guidelines. Where possible, this should be undertaken in advance of any work being carried out on-site, to provide protection for watercourses during site activities.

Monitoring requirements to protect drinking water quality

32. During construction, a programme of daily visual inspection of the watercourses, flow conditions (i.e. high, medium, low, or no flow), prevailing weather and any other pertinent observations, will be required to be implemented. The results should be recorded and the information submitted to Scottish Water (i.e. in a monthly progress report). This should be undertaken when water quality samples are taken. In the first instance, reporting should be provided to **EIA@scottishwater.co.uk**.

33. Depending on the vulnerability of the public water supply, Scottish Water may request that a water sampling programme shall be established and agreed with Scottish Water. This should assess the baseline water quality for a minimum of one year prior to any activities commencing on-site where possible, including ground investigations and any felling activities, to allow an accurate understanding of baseline conditions at the site. Water sampling should continue during construction and then post-construction for a minimum of one year. Following completion of one year of sampling post-construction, this should be reviewed to determine whether this should continue for a further agreed period. The parameters, frequency and sampling locations will also need to be agreed with Scottish Water. This monitoring will establish if any decline in water quality can be attributed to the development. It may also be necessary to establish trigger levels to determine when any potential issues should be reported to Scottish Water.

34. The appointed Contractor/Site Foreman or Ecological or Environmental Clerk of Works should have relevant knowledge and experience to provide advice and monitor compliance with measures for the protection of water quality in relation to abstractions for water supply.

35. Depending on the vulnerability of the public water supply, Scottish Water may request that a dedicated Environmental Manager be appointed and present on-site to assess and monitor any effects caused by the development.

Guidance documents

36. Please ensure the appropriate Guidance Documents are followed, including

- Guide to Hydropower Best Practice. SEPA, Version 2 (January 2015).
- Floating Roads on Peat. Forestry Civil Engineering and SNH. (August 2010).
- Constructed tracks in the Scottish Uplands, 2nd edition. SNH (June 2013).
- Forests and water UK Forestry Standard Guidelines, 5th Edition. Forestry Commission (2011).
- General Binding Rules under the Controlled Activities Regulations (see The Water Environment (Controlled Activities) Scotland Regulations (as amended) A Practical Guide, Version 7.2, SEPA (March 2015)).
- SEPA Pollution Prevention Guidance (visit http://www.sepa.org.uk/regulations/water/guidance/).

Protecting Scottish Water assets

37. If an activity associated with a development proposal is located within close proximity to Scottish Water assets, including water and waste water pipe infrastructure, treatment works and reservoirs etc., it is essential that these assets are protected from damage. To this end, the developer will be required to comply with Scottish Water's current process, guidance, standards and policies in relation to such matters.

38. Copies of Scottish Water's relevant record drawings can be obtained from the undernoted Asset Plan Providers. This is distinct from the right to seek access to and inspect apparatus plans at Scottish Waters area offices, for which no charge is applied.

Site Investigation Services (UK) Ltd

Tel: 0333 123 1223
Email: sw@sisplan.co.uk
www.sisplan.co.uk

National One-Call
Tel: 0844 800 9957
Email: swplans@national-one-call.co.uk
www.national-one-call.co.uk/swplans

39. It should be noted that the site plans obtained via the Asset Plan providers are indicative and their accuracy cannot be relied upon. It is therefore recommended that the developer contacts the **Scottish Water Asset Impact Team** at **service.relocation@scottishwater.co.uk** for further advice if assets are shown to be located in the vicinity of the proposed development, and where the exact location and the nature of the infrastructure shown could be a key consideration for the proposed development. An appropriate site investigation may be required to confirm the actual position of assets in the ground. Scottish Water will not be liable for any loss, damage or costs caused by relying upon plans or from carrying out any such site investigation.

40. Prior to any activity commencing, all known Scottish Water assets should be identified, located and marked-out.

41. Scottish Water expects method statements, safe systems of work and risk assessments to be prepared and submitted in advance to Scottish Water for formal review and acceptance. These documents shall consider and outline in detail how existing Scottish Water assets are to be protected and/or managed for the duration of any construction works and during operation of the development if relevant. These documents must be submitted to Scottish Water's Asset Impact team for formal prior written acceptance.

42. The developer shall obtain written acceptance from Scottish Water's Asset Impact Team where any site activities are intended to take place in the vicinity of Scottish Water's assets. The Asset Impact Team can advise on any potential risk mitigation measures that may be required.

43. Scottish Water and its representatives shall be allowed access to Scottish Water assets at all times for inspection, maintenance and repair. This will also ensure that the Scottish Water assets are protected and that any Scottish Water requirements are being observed.

44. Any obstruction or hindrance of access to Scottish Water assets should be avoided. The prompt and efficient use and manipulation of valves, hydrants, meters or other apparatus is required at all times. There should also be no interference with the free discharge from water main scours or sewer overflows.

45. In the event of an incident occurring that could affect Scottish Water, including any damage to assets, Scottish Water should be notified without delay, using the Customer Helpline number **0800 0778 778**, and the local contact if known. Scottish Water apparatus should not be interfered with or operated by anyone other than Scottish Water personnel.

46. The 'offset distance' is the distance between any Scottish Water asset and adjacent properties and structures. Scottish Water reserves the right to ask for an offset distance in accordance with its own current policy and standards and to suit specific circumstances. The details of this requirement should be confirmed with Scottish Water as an early part of the design process.

47. Stationary plant, equipment, scaffolding, construction or excavated material, etc. should not be placed over, or close to, any Scottish Water assets without the prior written consent of Scottish Water which may be withheld depending on circumstances on-site.

48. Special care should be taken to avoid the burying of Scottish Water assets or the obstruction of sewers or manholes with fill or other material. Arrangements for altering the level of any chambers should be agreed in advance with Scottish Water and these should be constructed in accordance with Scottish Water requirements. The cost of any work to Scottish Water assets will be met by the project developer.

49. Excavation works (e.g. of wind turbine foundations) should not be carried out in the proximity of a water or waste water main without due notice having been given to Scottish Water and prior written acceptance obtained. The developer will comply fully with any Scottish Water specific site requirements.

50. Any tree planting associated with the development (e.g. compensatory planting or screening etc.) should be undertaken in line with Water for Scotland 3rd Edition (April 2015) to ensure that Scottish Water assets are not put at risk by future growth of tree roots.

51. Vibration in close proximity to Scottish Water pipelines or ancillary apparatus should be managed in accordance with British Standard 5228-1:2009 (Code of practice for noise and vibration control on construction and open sites). The predicted levels of vibration should be agreed in advance with Scottish Water as part of the risk assessment and method statement and agreed vibration monitoring arrangements will be required.

52. The developer will consider the possibility of increased loading on Scottish Water apparatus and measures will be taken to eliminate or mitigate increased loading on assets. Care should be taken to identify any assets

which may be crossed by vehicles on the access route to the site and crossing points will be engineered to the requirements of Scottish Water. Any pipe crossing proposals are subject to prior written acceptance by Scottish Water.

53. Scottish Water will not accept liability for any costs incurred in fulfilling any of the above requirements during the development planning, construction or operational phases, either by the developer, the developer's associates, contractors or any other person or organisation involved in the project.

54. If the developer damages any Scottish Water asset they will be held liable for any costs resulting from this.

55. Scottish Water may require costs associated with the development to be reimbursed by the developer or the developer's agents.

Econsents_Admin@gov.scot

Theresa McInnes
Senior Case Officer
Energy Consents Unit
The Scottish Government

28/06/2017

Dear Ms McInnes,

Re: Revised Coire Glas Hydro Pumped Storage II - scoping

Thank you for your email of 16th May 2017. Further to our subsequent correspondence with the ECU, we are grateful for the provision of a revised timescale for our response.

The National Catalogue of Rights of Way shows there are rights of way and other recreational routes which appear to be affected by the various components of the scheme as shown on the Scoping Report's Figure 1 *Scheme Location and Overview*. As there is no definitive record of rights of way in Scotland, there may be routes that meet the criteria to be rights of way but have not been recorded as they have not yet come to our notice.

You will no doubt be aware there may now be general access rights over any property under the terms of the Land Reform (Scotland) Act 2003. Figure 2 *Environmental Context* indicates Core Paths Plans, prepared by local authorities as part of their duties under this Act, have been consulted. We are pleased to note that Figure 2 indicates that routes promoted in our book *Scottish Hill Tracks* are also being considered.

It is further noted that Figure 2 includes the *Great Glen Way*. We suggest the addition of the *Great Glen Canoe Trail* to this *Environmental Context*, as it is another of the *Scotland's Great Trails* network as designated by Scottish Natural Heritage. As the Scottish Canoe Association is listed as a non-statutory consultee, we suggest they are best placed to provide relevant input.

SSE is welcome to contact ScotWays directly if further detail about public access is required in order to inform preparation of their Environmental Statement.

I hope the information provided is useful to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,

Eleisha Fahy, Senior Access Officer

Scottish Environment Protection Agency
Buidheann Dion Àrainneachd na h-Alba

Our ref: PCS/153358
Your ref: None

Theresa McInnes
Energy Consents Unit
Scottish Government

If telephoning ask for:
Susan Haslam

By email only to: Econsents_Admin@gov.scot

20 June 2017

Dear Ms McInnes

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2011
Revised Coire Glas Pumped Storage Scheme - increase of generation from 600 MW to 1500 MW

Thank you for consulting SEPA on the scoping opinion for the above development proposal by your email received on 16 May 2017.

We provided you with our initial scoping advice on 2 June 2017, however following a meeting with SSE on 13 June we would like to provide this very slightly revised advice. To explain, in section 1.3 of our previous response we referred to the Cavern Power Station, when we should have referred to the Surge Shaft. In addition, also in section 1.3 we queried the potential impact the pipelines could have on overlying watercourses; we are now content that this is not an issue. All other aspects of this letter are identical to that we sent on 2 June 2017.

Advice to the determining authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection,** the information outlined below and in the attached appendix must be submitted in support of the application.

a) Map showing assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications.

b) Map showing assessment of all impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers.

c) Peat depth survey map and table detailing re-use proposals.

d) Map and table detailing forest removal.

e) Map and site layout of significant excavation, borrow areas and re-use proposals.

f) Schedule of mitigation including pollution prevention measures.

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment. Whilst we appreciate the detailed discussions undertaken during the previous application determination, current best practice and guidance have moved on since the pervious scheme received consent and we would expect the new application to demonstrate how this has been applied. This may result in, for example, amendments to the layout to avoid or reduce environmental impacts.

1. Site specific comments

1.1 In relation to section 1 of the appendix (site layout information) then for a development of this scale it is especially important to ensure that detailed layout plans are provided for all elements of the development. The plans must detail all the temporary or ancillary works such as laydown areas, rock and peat storage areas and site compounds, which we presume will be extensive for a development of this size. For example we note that the plan in the scoping report shows the workers camps but we presume there will be a significant number of other additional support areas required at the dam area itself and elsewhere.

1.2 In relation to section 2 of the appendix (CAR), as the developer is aware they will need to apply to vary their existing CAR authorisation. The Environmental Statement (ES) should provide information on the change in abstraction volume and regime proposed and any related changes in infrastructure. We encourage the developer to continue liaison with our local Regulatory Services team in Fort William regarding this issue.

1.3 In relation to section 3 of the Appendix (other water impacts) we provide the following site specific advice:

- We note that the existing access track from White Bridge through the forest requires upgrading. The ES should provide information on the extent of the works required here and elsewhere. We note that much of the track is on steep ground and runs close to a watercourse; the risk of pollution during works in this area would be especially high. Widening works to existing tracks should be shown on a plan to be carried out on the opposite side of the track to any watercourses. New alternative routes may be required in any specifically sensitive areas such as where existing tracks are within 10 m of the watercourse and significant engineering works would be required if the same line was kept.

- We note the new proposed track to the new Surge Shaft. We can confirm at this stage that due to the excessive impact on watercourses this has we do not consider the route shown at this stage to be acceptable. An alternative access should be proposed in the application.

- We are content that the previous baseline information provided on watercourse crossing points is acceptable. Additional survey work will however be required for any new access to the Surge Shaft. Clear information should be provided on the type of watercourse crossing proposed. The previous proposal for box culverts is not current good practice; bridges/bottomless or arched culverts sized to accommodate the 1 in

200 year flood event including mammal passages will be required.

- Clear detailed plans and drawings of the proposed jetty at the outfall structure on Loch Lochy should be provided; these will require separate CAR authorisation.

- We note that some of the temporary site accommodation areas are adjacent to small watercourses and as a result could be at risk of flooding. It must be ensured that any temporary accommodation (and any other proposed buildings) is sited on elevated ground and located outwith the flood plain of any neighbouring watercourses. Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale.

1.4 In relation to section 4 (peat) we provide the following site specific advice:

- We can confirm that a Peat Management Plan should be included with the submission.

- All excavated peat must be re-used on site with no permanent storage or disposal allowed. In addition floating track should be used to reduce the volume of excavated peat.

- We can confirm that we consider that the peat survey work carried out for the original application is still relevant to the new proposal. However in areas where deep peat has been found on the new access track further probing is required to see if the route can be amended to avoid impacts on deep peat. In addition probing information should also be provided for other areas where peat will be impacted, such as all temporary facilities such as laydown areas and construction compounds, to demonstrate that they are located appropriately.

- The Plan should consider proposals for peatland restoration works on the site, including for example, restoration of any redundant tracks or historic peat cuttings. Such works could also help compensate for loss of GWDTE.

1.5 In relation to section 5 (GWDTE) we provide the following site specific advice:

- We welcome the proposal to undertake a new NVC survey for the site. We will be especially interested in the mapping of potentially highly groundwater dependant habitats such as M16, which should wherever possible be avoided. Moderately groundwater dependant habitats should also be avoided wherever possible and where demonstrated that impacts are unavoidable, suitable mitigation measures outlined.

- Unless there have been significant changes in vegetation (which can be determined from a site walk over) then we are content that new Phase 1 survey is not required.

1.6 In relation to section 6 (existing groundwater abstractions) then it is our understanding that there are no existing groundwater abstractions within 250 m of any proposed infrastructure. If this is the case the ES can simply state this fact.

1.7 In relation to section 8 (borrow pits) and rock generation generally we provide the following comments:

- We understand that rock will be won from the upper reservoir area and construction of the tunnels and that a greater quantity of rock than is required to build the

development. We also note that there is an existing borrow pit near the entrance to the site. As a result we do not expect the application to include any proposals for any further separate borrow pits and are unlikely to accept any such proposals.

- We expect the application to be supported by an assessment of the amount of overburden and rock that will be generated, which should be demonstrated to be minimised as much as possible. This should be accompanied by detailed proposals either for justifiable re-use on site or use or disposal elsewhere. In view of the even greater quantity of rock that will be generated above that estimated for the previous proposal then we can confirm that generic information on options will not be acceptable; there needs to be a clear idea of how and where the material will be used. Our clear preference is for the materials to be put to local beneficial use. The submission will need to include a detailed map of where and how rock will be re-used including volumes and depths. Any waste materials will need to be removed from the site and disposed of to a suitably licenced facility or made use of via a suitable waste management exemption. We understand that there may be significant transportation issues with removal of any of the material from the site so, although not an issue directly within our remit, we recommend that the assessment includes information on transport implications.

1.8 In relation to section 9 (pollution) we can confirm that from our perspective an outline Construction Environmental Management Plan (CEMP) need not be provided with the application. Instead, we expect the detailed site plans we have requested in this letter to demonstrate how impacts on the environment have been minimised through design and all mitigation should be detailed within a suitably robust schedule of mitigation..

1.9 Please see our website for further information above the Reservoirs Act 2011.

Regulatory advice for the applicant

2. Regulatory requirements

2.1 Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental llicences may be required for any installations or processes.

2.2 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact Margaret Conaghan of the regulations team in your local SEPA office at: Carr's Corner Industrial Estate, Lochybridge, Fort William, PH33 6TL - Tel: 01397 704426

Should you wish to discuss this letter please do not hesitate to contact me on 01349 860359 or planning.dingwall@sepa.org.uk.

Yours sincerely

Susan Haslam
Senior Planning Officer
Planning Service

ECopy to: Jamie.Watt@sse.com; Theresa.McInnes@gov.scot; Liz.McLachlan@SNH.gov.uk

Disclaimer
This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. Further information on our consultation arrangements generally can be found on our website planning pages.

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

1. Site layout

1.1 All maps must be based on the Ordnance Survey 1: 10 000 scale or greater base mapping to provide an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges.

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

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

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

a) The location and design of the intakes and outfalls and their impact upon the morphology of the water environment.

b) Compensation flow.

c) Fish passages.

d) Other relevant CAR or planning applications or consents for abstractions/hydro schemes.

e) Sensitive water uses, water dependent species (including bryophytes) and ecosystems.

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

3. Other impacts on the water environment

3.1 Other elements of the scheme must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in the water environment cannot be avoided then the submission must include a map showing:

a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.

b) A buffer of at least 10 m drawn around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.

c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

3.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

3.3 Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.

3.4 Refer to Appendix 2 of our Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a Flood Risk Assessment.

4. Disturbance and re-use of excavated peat and other carbon rich soils

4.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO_2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO_2 to the atmosphere. Developments should aim to minimise this release."

4.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO_2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat.

4.3 The submission must include:

a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Developments on peatland: Site surveys and best practice) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.

b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.

4.4 To avoid delay and potential objection proposals must be in accordance with Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste and our Regulatory Position Statement – Developments on Peat.

4.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.

4.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

5. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)

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

a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.

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

6. Existing groundwater abstractions

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

a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations

deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.

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7.1 If forestry is present on the site, we prefer a site layout which avoids large scale felling as this can result in large amounts of waste material and a peak in release of nutrients which can affect local water quality.

7.2 The submission must include a map with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.

8. Borrow pits

8.1 Scottish Planning Policy states (Paragraph 243) that "Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place." The submission must provide sufficient information to address this policy statement.

8.2 The following information should also be submitted:

a) A map showing the location, size, depths and dimensions of each borrow pit.

b) A map showing in relation to each proposed excavation, stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres from working areas.

c) A site-specific buffer drawn around each loch or watercourse proportionate to the depth of excavations and at least 10 m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.

d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.

e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.

f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.

g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and vehicle washing areas. The drawing notes should include a commitment to check these daily.

h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Developments on peatland: Site surveys and best practice) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO_2.

i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.

j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

9. Pollution prevention and environmental management

9.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration.

9.2 A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques, regulatory requirements, the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to the Pollution prevention guidelines.

10. Decommissioning / Repowering

10.1 Proposals to discard materials that are likely to be classed as waste would be unacceptable under current waste management licensing and under waste management licensing at time of decommissioning if a similar regulatory framework exists at that time. Further guidance on this may be found in the document Is it waste - Understanding the definition of waste.

10.2 The layout and the general principles for decommissioning must demonstrate waste minimisation and compliance with the above waste regulatory position.

Scottish Environment Protection Agency
Buidheann Dion Àrainneachd na h-Alba

Our ref: PCS/153059
Your ref: None

Theresa McInnes
Energy Consents Unit
Scottish Government

If telephoning ask for:
Susan Haslam

By email only to: Econsents_Admin@gov.scot

2 June 2017

Dear Ms McInnes

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2011
Revised Coire Glas Pumped Storage Scheme - increase of generation from 600 MW to 1500 MW

Thank you for consulting SEPA on the scoping opinion for the above development proposal by your email received on 16 May 2017. We received the scoping report direct from SSE on 15 May 2017 and are meeting with them on 13 June to discuss the project.

Advice to the determining authority

We consider that the following key issues must be addressed in the Environmental Impact Assessment process. To **avoid delay and potential objection,** the information outlined below and in the attached appendix must be submitted in support of the application.

a) Map showing assessment of all engineering works within and near the water environment including buffers, details of any flood risk assessment and details of any related CAR applications.

b) Map showing assessment of all impacts upon Groundwater Dependent Terrestrial Ecosystems (GWDTE) and buffers.

c) Peat depth survey map and table detailing re-use proposals.

d) Map and table detailing forest removal.

e) Map and site layout of significant excavation, borrow areas and re-use proposals.

f) Schedule of mitigation including pollution prevention measures.

SEPA Dingwall Office
Graesser House, Fodderty Way,
Dingwall Business Park, Dingwall IV15 9XB
tel 01349 862021 fax 01349 863987
www.sepa.org.uk • customer enquiries 03000 99 66 99

Further details on these information requirements and the form in which they must be submitted can be found in the attached appendix. We also provide site specific comments in the following section which can help the developer focus the scope of the assessment. Whilst we appreciate the detailed discussions undertaken during the previous application determination, current best practice and guidance have moved on since the pervious scheme received consent and we would expect the new application to demonstrate how this has been applied. This may result in, for example, amendments to the layout to avoid or reduce environmental impacts.

1. Site specific comments

1.1 In relation to section 1 of the appendix (site layout information) then for a development of this scale it is especially important to ensure that detailed layout plans are provided for all elements of the development. The plans must detail all the temporary or ancillary works such as laydown areas, rock and peat storage areas and site compounds, which we presume will be extensive for a development of this size. For example we note that the plan in the scoping report shows the workers camps but we presume there will be a significant number of other additional support areas required at the dam area itself and elsewhere.

1.2 In relation to section 2 of the appendix (CAR), as the developer is aware they will need to apply to vary their existing CAR authorisation. The Environmental Statement (ES) should provide information on the change in abstraction volume and regime proposed and any related changes in infrastructure. We encourage the developer to continue liaison with our local Regulatory Services team in Fort William regarding this issue.

1.3 In relation to section 3 of the Appendix (other water impacts) we provide the following site specific advice:

- We note that the existing access track from White Bridge through the forest requires upgrading. The ES should provide information on the extent of the works required here and elsewhere. We note that much of the track is on steep ground and runs close to a watercourse; the risk of pollution during works in this area would be especially high. Widening works to existing tracks should be shown on a plan to be carried out on the opposite side of the track to any watercourses. New alternative routes may be required in any specifically sensitive areas such as where existing tracks are within 10 m of the watercourse and significant engineering works would be required if the same line was kept.

- We note the new proposed track to the Cavern Power Station. We can confirm at this stage that due to the excessive impact on watercourses this has we do not consider the route shown at this stage to be acceptable. An alternative access should be proposed in the application.

- We presume that the tunnels will be dug using directional digging of some sort and will be completely underground and not directly impact the surface of the land above them. This should however be clarified in the submission. We are interested in ensuring that watercourses above the tunnel route do not become under-drained and this should be considered in the assessment. If under-draining is likely the routes in these areas should be reconsidered.

- We are content that the previous baseline information provided on watercourse crossing points is acceptable. Additional survey work will however be required for any new access to the Cavern Power Station. Clear information should be provided on the

type of watercourse crossing proposed. The previous proposal for box culverts is not current good practice; bridges/bottomless or arched culverts sized to accommodate the 1 in 200 year flood event including mammal passages will be required.

- Clear detailed plans and drawings of the proposed jetty at the outfall structure on Loch Lochy should be provided; these will require separate CAR authorisation.

- We note that some of the temporary site accommodation areas are adjacent to small watercourses and as a result could be at risk of flooding. It must be ensured that any temporary accommodation (and any other proposed buildings) is sited on elevated ground and located outwith the flood plain of any neighbouring watercourses. Small watercourses are often poorly understood with respect to the severity of the flood hazard that can be generated on a catchment of this scale.

1.4 In relation to section 4 (peat) we provide the following site specific advice:

- We can confirm that a Peat Management Plan should be included with the submission.

- All excavated peat must be re-used on site with no permanent storage or disposal allowed. In addition floating track should be used to reduce the volume of excavated peat.

- We can confirm that we consider that the peat survey work carried out for the original application is still relevant to the new proposal. However in areas where deep peat has been found on the new access track further probing is required to see if the route can be amended to avoid impacts on deep peat. In addition probing information should also be provided for other areas where peat will be impacted, such as all temporary facilities such as laydown areas and construction compounds, to demonstrate that they are located appropriately.

- The Plan should consider proposals for peatland restoration works on the site, including for example, restoration of any redundant tracks or historic peat cuttings. Such works could also help compensate for loss of GWDTE.

1.5 In relation to section 5 (GWDTE) we provide the following site specific advice:

- We welcome the proposal to undertake a new NVC survey for the site. We will be especially interested in the mapping of potentially highly groundwater dependant habitats such as M16, which should wherever possible be avoided. Moderately groundwater dependant habitats should also be avoided wherever possible and where demonstrated that impacts are unavoidable, suitable mitigation measures outlined.

- Unless there have been significant changes in vegetation (which can be determined from a site walk over) then we are content that new Phase 1 survey is not required.

1.6 In relation to section 6 (existing groundwater abstractions) then it is our understanding that there are no existing groundwater abstractions within 250 m of any proposed infrastructure. If this is the case the ES can simply state this fact.

1.7 In relation to section 8 (borrow pits) and rock generation generally we provide the following comments:

- We understand that rock will be won from the upper reservoir area and construction of the tunnels and that a greater quantity of rock than is required to build the development. We also note that there is an existing borrow pit near the entrance to the site. As a result we do not expect the application to include any proposals for any further separate borrow pits and are unlikely to accept any such proposals.

- We expect the application to be supported by an assessment of the amount of overburden and rock that will be generated, which should be demonstrated to be minimised as much as possible. This should be accompanied by detailed proposals either for justifiable re-use on site or use or disposal elsewhere. In view of the even greater quantity of rock that will be generated above that estimated for the previous proposal then we can confirm that generic information on options will not be acceptable; there needs to be a clear idea of how and where the material will be used. Our clear preference is for the materials to be put to local beneficial use. The submission will need to include a detailed map of where and how rock will be re-used including volumes and depths. Any waste materials will need to be removed from the site and disposed of to a suitably licenced facility or made use of via a suitable waste management exemption. We understand that there may be significant transportation issues with removal of any of the material from the site so, although not an issue directly within our remit, we recommend that the assessment includes information on transport implications.

1.8 In relation to section 9 (pollution) we can confirm that from our perspective an outline Construction Environmental Management Plan (CEMP) need not be provided with the application. Instead, we expect the detailed site plans we have requested in this letter to demonstrate how impacts on the environment have been minimised through design and all mitigation should be detailed within a suitably robust schedule of mitigation..

1.9 Please see our website for further information above the Reservoirs Act 2011.

Regulatory advice for the applicant

2. Regulatory requirements

2.1 Proposed engineering works within the water environment will require authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.

2.2 Details of regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact Margaret Conaghan of the regulations team in your local SEPA office at: Carr's Corner Industrial Estate, Lochybridge, Fort William, PH33 6TL - Tel: 01397 704426

Should you wish to discuss this letter please do not hesitate to contact me on 01349 860359 or planning.dingwall@sepa.org.uk.

Yours sincerely

Susan Haslam
Senior Planning Officer
Planning Service

ECopy to: Jamie.Watt@sse.com; Theresa.McInnes@gov.scot

Disclaimer
This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. Further information on our consultation arrangements generally can be found on our website planning pages.

Appendix 1: Detailed scoping requirements

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

1. Site layout

1.1 All maps must be based on the Ordnance Survey 1: 10 000 scale or greater base mapping to provide an adequate scale with which to assess the information. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible to minimise the extent of new works on previously undisturbed ground. Cabling must be laid in ground already disturbed such as verges.

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

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

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

a) The location and design of the intakes and outfalls and their impact upon the morphology of the water environment.

b) Compensation flow.

c) Fish passages.

d) Other relevant CAR or planning applications or consents for abstractions/hydro schemes.

e) Sensitive water uses, water dependent species (including bryophytes) and ecosystems.

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

3. Other impacts on the water environment

3.1 Other elements of the scheme must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in the water environment cannot be avoided then the submission must include a map showing:

a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.

b) A buffer of at least 10 m drawn around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.

c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.

3.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.

3.3 Further advice and our best practice guidance are available within the water engineering section of our website. Guidance on the design of water crossings can be found in our Construction of River Crossings Good Practice Guide.

3.4 Refer to Appendix 2 of our Standing Advice for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a Flood Risk Assessment.

4. Disturbance and re-use of excavated peat and other carbon rich soils

4.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO_2) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO_2 to the atmosphere. Developments should aim to minimise this release."

4.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO_2 and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat.

4.3 The submission must include:

a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's Developments on peatland: Site surveys and best practice) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.

b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.

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Scottish Natural Heritage
Dualchas Nàdair na h-Alba
All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Theresa McInnes
Energy Consents Unit
The Scottish Government

6 June 2017

Our ref: CNS/REN/HYD/Coire Glas

Dear Theresa

Regulation 7 of the Electricity works (Environmental Impact Assessment) (Scotland) (EIA) Regulations 2000, for the revised Coire Glas Hydro Pumped Storage Scheme. Scoping Request.

Thank you for your e-mail, dated 16 May 2017, requesting our scoping advice on the above proposal. We received a copy of the Scoping Report direct from the developers.

1. Background

We have provided advice on the previous iteration of this proposal and on the request for an extension of the previous consent. We note from the scoping report that the dam, upper reservoir, construction access, jetty and administration buildings will be of a similar size to those currently consented.

Our consideration of the scoping report is limited to the following sections within our remit, namely:

Section 3. The proposed Development
Section 6. Environmental issues

2. Key issues

The applicants will need to examine the history of the currently consented scheme, particularly the evolution of their design, associated mitigation and the discussions leading towards consents. The Environmental Statement should clearly illustrate whether or not this proposal would undermine the mitigation and design thinking that was built in to the consented scheme.

In addition to the issues and interests which were covered by the 2012 Environmental Impact Assessment (EIA), new policies have been adopted in SPP and NPF3 in relation to the following natural heritage interests:

- Impacts on carbon rich soils, deep peat and priority peatland habitats
- Impacts on wild land areas

To guide the applicant, we have provided detailed comments on what should be considered during the EIA process in Annex A of this letter.

INVESTOR IN PEOPLE

Scottish Natural Heritage, East Highland Area, Fodderty Way, Dingwall Business Park, Dingwall, Ross-shire. IV15 9XB
Tel: 01349 865333 Fax: 01349 865609 Website: www.snh.org.uk

Dualchas Nàdair na h-Alba, Sgire Taobh Sear Na Gaidhealtachd, Slighe Fodhraitidh, Páirce Gnìomhachas Inbhir Pheofharain, Inbhir Pheofharain. IV15 9XB
Fòn: 01349 865333 Facs: 01349 865609 Làrach-Lìnn: www.snh.org.uk

3. Our comments on the Scoping Report
The scoping report includes all the topics that we wish to be covered in the EIA process.

We request that each chapter of the ES is saved to a separate pdf file with a maximum size of 10MB in order to make the file sizes manageable.

Should you have any queries about this letter please contact me at the address below.

Yours sincerely

Liz McLachlan
Area Officer
South Highland
liz.mclachlan@snh.gov.uk

Annex A – Further details to assist with the EIA for Coire Glas 1500MW scheme

1 Guidance for assessing impacts on the natural heritage
There are a variety of guidance and advice notes for developments available on our website, covering topics such as landscape, birds and protected species. We would expect the applicant to follow the latest guidance as published on our website via http://www.snh.gov.uk/planning-and-development/ .

2 Service Level Statement (SLS)
We refer the applicant to our Service Level Statement (SLS), which sets out the level of engagement they may expect from us during the planning process. The SLS is available on our website via http://www.snh.gov.uk/planning-and-development/renewable-energy/our-approach-to-renewables/managing-applications/ .

3 Landscape and Visual Impact Assessment (LVIA)
We support the proposal to include an updated LVIA in the EIA. We recommend that the ES explains the design process used to select the final layout assessed within the ES, any alternatives considered and how landscape and visual mitigation has been incorporated.

3.1 Wild Land Areas (WLA)
We agree with the view presented in the Scoping report that impacts on the Wild Land Areas are unlikely to be significant and therefore this issue can be scoped out.

3.3 Cumulative Assessment
There is the potential that this proposal in combination with other renewable energy projects in the area will create adverse landscape and visual impacts therefore we recommend a cumulative assessment is required. We suggest in the analysis of alternatives consideration is given to the design compatibility with the adjacent schemes, to mitigate cumulative landscape and visual impacts.

4 Peat
Carbon rich soils, deep peat and priority peatland habitat has been identified in Scottish Planning Policy as a nationally important mapped resource.

The area of this development is mapped (http://www.snh.gov.uk/docs/A2009248.pdf) as Class 2 for carbon rich soils, deep peat and priority peatland habitat, i.e.

- Most of the vegetation cover indicates priority peatland habitats
- All soils are carbon-rich soil and deep peat

We therefore advise that an assessment should be made of the impacts of the proposal on carbon rich soils, deep peat and priority peatland habitat (not just a review of peat depth data as suggested on p31). The assessment should describe the overall size and scale of resource including the type of peatland likely to be effected, quantify the loss of any of that resource as well as any loss of function of the habitat, whereby the peat, or peatland habitat, is likely to be lost or significantly degraded as a result of the development. It should also describe the frequency of drains and peat cutting, the presence of plant species indicating peat formation capability and/or lack of disturbance, any areas of natural surface pattern, and whether or not there is any invasion by woodland or scrub. It should also detail whether the development footprint contains any of the following:

- an abundance of Sphagnum-rich ridges,
- ridges of Sphagnum – Betula nana,
- hummocks of S.fuscum or S. austinii

- Peat mounds
- Hollows of Sphagnum or bare peat

The overall effect of the above Scottish Government policies and initiatives is an expectation that developments will be no less than neutral in their impacts on peat and areas of peatland habitat. Mitigation and compensation measures to achieve that should be integral to any planning application affecting the peatland resource and should be presented as a Peatland Management Plan.

5 Designated Sites
There are no designated sites in the vicinity of this proposal or likely to be affected by this proposal.

6. Protected Species – birds and mammals
We support the proposal to resurvey all protected birds and mammal species as described in the Scoping Report. However for clarification fox, dog, red and roe deer, inverts and amphibians do not require survey. Due to the mobile nature of mammals survey work should be undertaken within 12 months of the submission date of any application which comes forward and should extended to include any off site work that may impact on protected species. For example bat surveys should be completed for any bridges that are to be upgraded or re-pointed as a result of this development, and appropriate licenses obtained where applicable.

All surveys should follow the latest agreed methodologies. Results and any possible mitigation measure should be provided in the ES and if necessary in a confidential annex.

7**. Habitats**
We support the proposal to undertake a new Phase 1 and NVC Survey of the site. However, it should be noted that it is not just the land directly affected by works which may be impacted upon, but also a buffer zone which may be indirectly affected by, for example, alterations to hydrology, vehicle movement compaction or land to be managed as part of compensation or mitigation of the proposal.

We would expect surveys to extend to the proposed access route and new tracks. The ES should also fully consider the potential natural heritage impacts of vehicle movements, track creation and modification along the full length of the proposed routes, including those outwith the development area. The applicant may find the "Constructed Tracks in the Scottish Uplands" (available from our website publications pages, via http://www.snh.org.uk/pdfs/publications/heritagemanagement/constructedtracks.pdf) provides useful advice on track creation and maintenance in upland area. The Forestry Commission's "Forests and Water Guidelines" (4th edition) (available from http://www.forestry.gov.uk/PDF/fcgl002.pdf/$FILE/fcgl002.pdf) also provides useful advice on water crossings and working in forests.

The importance of habitat types should be analysed, and that the amount of habitat lost will be quantified, we recommend that habitat mitigation measures, including any areas of restoration are described in a dedicated Habitat Management Plan. Further guidance on what to include in Habitat Management Plans can be found on our website (http://www.snh.gov.uk/planning-and-development/renewable-energy/onshore-wind/general-advice-and-information/)

Advice on peatland habitats is given above.

8. Access and Recreation
With reference to the Land Reform (Scotland) Act 2003, the applicant should pay due regard to the potential use of the area for recreation by the general public when designing and

planning the proposed development. Regard should be given not only to the proposed development site but also the proposed access routes and additional tracks, which may increase the perceived recreational value of the area. Access should not be restricted unless necessary for health and safety or other overriding reasons. Where access needs to be restricted at any time, clear signage following the Scottish Outdoor Access Code branding guidelines is recommended (http://www.outdooraccessscotland.com/branding/).

Development Management and Strategic Road Safety
Trunk Road and Bus Operations

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Direct Line: 0141 272 7387, Fax: 0141 272 7350
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TRANSPORT SCOTLAND
CÒMHDHAIL ALBA

Theresa McInnes
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Econsents_Admin@gov.scot

Your ref:

Our ref:
TS00538

Date:
05/06/2017

Dear Sirs,

REGULATION 7 OF THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) (EIA) REGULATIONS 2000 – SCOPING REPORT FOR THE REVISED COIRE GLAS HYDRO PUMPED STORAGE SCHEME

With reference to your recent correspondence on the above development, we acknowledge receipt of the Coire Glas Scoping Report (SR) prepared by SSE Renewables in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Trunk Road and Bus Operations (TRBO). Based on the review undertaken, we would provide the following comments.

Previous Consent

We note that Section 36 consent was granted on 13th December 2013 to construct and operate a hydroelectric pumped storage scheme at Coire Glas (approximately 13km south-west of Fort Augustus). The development would be located on the shore and within the hills to the north-west of Loch Lochy. The nearest trunk roads to the site are the A82(T) and the A87(T).

Proposed Development

We understand that the Applicant is now proposing to increase the generating capacity of the project from the consented 600 megawatts (MW) to 1500 MW. The SR indicates that the increase in generating capacity will require (inter alia) a larger excavation of rock which will in turn require to be disposed of. It is anticipated that other elements of the project, such as the dam, upper reservoir, construction access, jetty and administration building will be of a similar size and nature to that of the consented development.

Site Access

The SR indicates that site access will be taken from two points – the A87(T) at White Bridge, Invergarry and the A82(T) at North Laggan. The SR indicates that "*Where access roads form part of a public road or interface with public roads (i.e. at access points) road standards would be agreed with Transport Scotland and The Highland Council*". We would indicate at this stage that any improvements to the trunk road network will require to be discussed with and approved by Transport Scotland.

Details of the site access points should be provided with the ES for review.

Environmental Impact

We note that the 2012 Environmental Statement (ES) supporting the original application assessed the level of traffic generation during construction, and found that the most intense period of traffic generation occurred during the period when excavated rock was being transported from the site. The majority of these loads left the site via the A82 junction. The ES concluded that the level of trips generated by the original proposal would not pose any capacity issues to the road network and there would be no significant environmental impacts.

The SR states that a revised assessment of the potential effects on traffic and transport from the construction and operation of the new proposal will be undertaken as part of the ES. Transport Scotland considers this appropriate.

The SR indicates that an updated construction noise assessment will be undertaken, in addition to an assessment of the potential construction vibration and dust effects. This is considered acceptable.

Grid Connection

It is noted that the developer will make a separate application for connection to the National Grid, and consequently, there will be no consideration of the environmental effects associated with this element of the development within the Environmental Statement.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 226 6923.

Yours faithfully

Ken Aitken

Transport Scotland
Trunk Road and Bus Operations

cc Alan DeVenny – SYSTRA Ltd.

17 May 2017

Theresa McInnes
Senior Case Officer
Energy Consents Unit
Scottish Government

Dear Ms McInnes,

Coire Glas Hydro Pumped Storage Scheme

Thank you for giving VisitScotland the opportunity to comment on the above Hydro Pumped Storage Scheme.

Our response focuses on the crucial importance of tourism to Scotland's local and national economy, and of the natural landscape for visitors.

Background Information

VisitScotland, as Scotland's National Tourism Organisation, has a strategic role to develop Scottish tourism in order to get the maximum economic benefit for the country. It exists to support the development of the tourism industry in Scotland and to market Scotland as a quality destination.

While VisitScotland understands and appreciates the importance of renewable energy, tourism is crucial to Scotland's economic and cultural well-being. It sustains a great diversity of businesses throughout the country. According to a recent independent report by Deloitte, tourism generates £11 billion for the economy and employs over 200,000 - 9% of the Scottish workforce. Tourism provides jobs in the private sector and stimulates the regeneration of urban and rural areas.

One of the Scottish Government and VisitScotland's key ambitions is to grow tourism revenues and make Scotland one of the world's foremost tourist destinations. This ambition is now common currency in both public and private sectors in Scotland, and the expectations of businesses on the ground have been raised as to how they might contribute to and benefit from such growth.

Importance of scenery to tourism

Scenery and the natural environment have become the two most important factors for visitors in recent years when choosing a holiday location.

The importance of this element to tourism in Scotland cannot be underestimated. The character and visual amenity value of Scotland's landscapes is a key driver of our tourism product: a large majority of visitors to Scotland come because of the landscape, scenery and the wider environment, which supports important visitor activities such as walking, cycling wildlife watching and visiting historic sites.

The VisitScotland Visitor Experience Survey (2011/12) confirms the basis of this argument with its ranking of the key factors influencing visitors when choosing Scotland as a holiday location. In this study, over half of visitors rated scenery and the natural environment as the main reason for visiting Scotland. Full details of the Visitor Experience Survey can be found on the organisation's corporate

website, here: http://www.visitscotland.org/research_and_statistics/tourism_topics/wind_farms-1.aspx

Taking tourism considerations into account

We would suggest that full consideration is also given to the Scottish Government's 2008 research on the impact of wind farms on tourism. In its report, you can find recommendations for planning authorities which could help to minimise any negative effects of wind farms on the tourism industry. The report also highlights a request, as part of the planning process, to provide a tourism impact statement as part of the Environmental Impact Analysis. Planning authorities should also consider the following factors to ensure that any adverse local impacts on tourism are minimised:

- The number of tourists travelling past en route elsewhere
- The views from accommodation in the area
- The relative scale of tourism impact i.e. local and national
- The potential positives associated with the development
- The views of tourist organisations, i.e. local tourist businesses or VisitScotland

The full study can be found at www.scotland.gov.uk/Publications/2008/03/07113507/1

Conclusion

Given the aforementioned importance of Scottish tourism to the economy, and of Scotland's landscape in attracting visitors to Scotland, VisitScotland would strongly recommend any potential detrimental impact of the proposed development on tourism - whether visually, environmentally and economically - be identified and considered in full.

VisitScotland strongly agrees with the advice of the Scottish Government –the importance of tourism impact statements should not be diminished, and that, for each site considered, an independent tourism impact assessment should be carried out. This assessment should be geographically sensitive and should consider the potential impact on any tourism offerings in the vicinity.

VisitScotland would also urge consideration of the specific concerns raised above relating to the impact any perceived proliferation of developments may have on the local tourism industry, and therefore the local economy.

We hope this response is helpful to you.

Yours sincerely

[redacted]

Douglas Keith
Government and Parliamentary Affairs
VisitScotland

McInnes T (Theresa)

From: Mary Norris <mary.norris50@yahoo.co.uk>
Sent: 22 May 2017 17:06
To: McInnes T (Theresa)
Subject: revised Coire Glas Pumped Storage

Good Afternoon Theresa

Thank you for the recent DVD regarding the proposed Coire Glas pumped storage.

We have our Hire Boat business of 34 cruisers at the north end of Loch Lochy and we obviously have concerns regarding moving water levels. We have been discussing this with Scottish Canals who I believe have a meeting set up with appropiate ministers. They will be representing ourselves at this time also. It is imperative that the business is not interupted with its operations. We are a very important employer in the area, with 20 staff, and at this moment provide over 700 hundred holidays each year to customers from all over the world.

I sincerley hope that we will considered in their operations

kind regards

Mary Norris

West Highland Sailing