

25/01599/S36 - Glen Earrach Pumped Storage Hydro (PSH) scheme - construction and operation of a PSH.

Summary of key consultee/objection issues and additional THC comments

22 January 2026

Key Internal Consultee Issues

Internal consultee	Summary of response/s (Dec 2025)	Next steps	GEE Response (Jan 2026)
Access Officer	Access management Plan required as a condition. Issue of possible temporary or permanent diversion of a Core Path – <i>Ongoing dialogue between Applicant & Access Officer to address issues</i>	Can be addressed via ongoing dialogue and condition	GEE met with THC access officer on 31 st October 2025 (Stewart Eastaugh (Environment - Dev & Active Travel)) whereby it was agreed that a planning condition for an Access Management Plan would be appropriate for the Proposed Development. These discussions included the core path within the red line boundary where an adjacent path would be constructed to the forestry track at the entrance and then the core path would be upgraded where it leaves the forestry track to a specification supplied by THC in November.
Dev Planning	Current excess of wind power in Highlands will be addressed by 2031 by grid improvements and other types of energy storage are available. Significant. Environmental mitigation proposed, but lack of detail at this stage. Development will be in overall conformity with dev plan if fuller justification provided and consultees are satisfied on mitigation.	Applicant could address issue with further statement on need for the development, both in terms of the principle of PSH and the scale of GE scheme	The Intergovernmental Panel on Climate Change (IPCC, 2022) considers that PSH technology can contribute to all three goals of the World Energy Council’s 2022 Energy Trilemma (World Energy Council, 2022): energy security, energy equity, and environmental sustainability. PSH schemes are additionally supported at a national level and have been identified as ‘National Development’ through National Planning Framework 4 (NPF4), which formally establishes the need for this development type in Scotland and provides in principle support for it. The Draft Scottish Energy Strategy and Just Transition Plan (Scottish Government, 2023) support the development of new PSH schemes in Scotland. NPF4 Policy 11 is one of the key national policies relevant to the assessment of a PSH scheme. The Policy intent is to ‘encourage, promote and facilitate all forms of renewable energy development...’ with the ‘expansion of renewable, low-carbon and zero emissions technologies’ being the policy outcome. “The greatest weight in consideration of the Proposed Development in the context of NPF4 is afforded to Energy policy...Significant weight is to be placed on the contribution of the Proposed Development to renewable energy generation targets and on greenhouse gas emissions reduction targets. The Proposed Development will store and supply a considerable amount of electricity per year, and act as an enabling technology for harnessing more renewable generation and will thus support meeting renewable energy targets”. Policy 11(a) states that ‘Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported’. The policy expressly includes energy storage, such as PSH, in the Proposed Development. In line with Policy 11(a) it is considered that the Proposed Development, as a PSH, should be supported, and it is noted that the Proposed Development aligns with the International, UK and Scottish Government’s policy of transitioning to a net zero economy. The Proposed Development is considered to accord with Policy 67 of the Highland wide Local Development Plan. Policy 67 requires ‘development proposals to be well related to the source of the primary renewable resources that are needed for their operation. The Proposed Development Site is considered to be in a highly suitable location for a pumped storage hydro project, with the potential for industry leading levels of energy efficiency. This is due to the topography and geology of the area between Loch nam Breac Dearga and Loch Ness. The Proposed Development would be able to store approximately 34,000 MWh of energy, importing up to 2,000 MW, and exporting up to 1,800 MW of electricity. The Proposed Development would support the expansion of the renewable energy sector and contribute to Scotland’s transition from a low-carbon to a zero-carbon energy supply. In addition to its conformity with Policy 67 and its locational and technical suitability, the Proposed Development would deliver tangible system level benefits that directly support the policy objectives set out in NPF4 and the wider national and international energy framework. The Proposed Development will enable surplus renewable electricity to be stored during periods of oversupply and

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			releasing it during periods of higher demand. As such, the Proposed Development would help to reduce curtailment, improve utilisation of renewable generation, thus reducing the reliance on gas fired generation, which is often dependent on imported fuel. In doing so, the Proposed Development would contribute simultaneously to emissions reduction, energy security, and lower overall system costs, reinforcing its alignment with Policy 11, the Energy Trilemma objectives identified by the IPCC, and Scotland's transition to a resilient, affordable, net zero electricity system.
Ecology	Holding objection - clarity on some aspects of calculation of biodiversity units and on the grounds of confidence of peatland enhancement being delivered.	Further information required and possible direct dialogue with Ecology on details of BNG and peatland works	In the absence of a formal requirement for Biodiversity Net Gain (BNG) assessment in Scotland as guidelines are awaited, the Scottish and Southern Energy Renewables (SSER) Biodiversity Toolkit ('SSER Toolkit') has been utilised to provide a metric for BNG assessment for the Proposed Development. The SSER Toolkit has been utilised on projects across Scotland and is considered more effective in a Scottish context, with allowance for greater use of professional judgement to better cater for extensive upland environments in Scotland. It was agreed prior to the application with NatureScot that the SSER Toolkit would be used. Baseline habitat data for areas outside the detailed survey zone within the application relied on desk-based sources and existing knowledge, as noted in EIAR Appendix 7.5. Likely blanket bog areas and existing planting have been excluded from proposed planting. Remaining areas are assumed to be upland heathland, similar in condition to surveyed zones, which is considered a robust assumption given the prevalence of wet heath in the region. As part of the Peat Management Plan that will be further developed and submitted prior to the Operation Phase of the Proposed Development, ground-checks will confirm suitability and avoid planting on sensitive habitats such as unidentified blanket bog or flushes. Leaving small unplanted patches will enhance woodland structure and connectivity, while thinning uphill will create a naturalistic effect. Even if larger exclusions occur, the estimated 22% biodiversity net gain provides flexibility to meet the 10% target, making this approach reasonable and proportionate. The Applicant considers the significant commitment of planting to be treated as enhancement as it fits with NatureScot's "Developing with Nature" guidance. Within this guidance it is confirmed that "it is only when these measures result in biodiversity being left in a better state than before development that nature is enhanced and positive effects for biodiversity have been secured." The guidance emphasises that measures should be "locally and ecologically relevant" and consider how they complement, substitute for or restore lost, degraded or disturbed habitats." These principles support treating native woodland establishment as enhancement of existing heathland systems, particularly where the woodland types reflect natural Scottish upland conditions and retain characteristic heathland flora. The Applicant is committed to offsite peatland restoration. There have been ongoing discussions with a landowner (identified in the Confidential Annex as Forestry and Land Scotland) who are able to provide areas where peatland restoration could take place. To showcase this opportunity, the Applicant has provided details of a typical site that could be restored but would note there are other confidential sites that could be further used if required. As such, the Applicant would propose a planning condition be inserted that requires the restoration at a ratio of 1:10 + 10% of enhancement in line with the request from NatureScot to be submitted as part of an Offsite Peat Restoration Plan prior to the commencement of Construction and then implemented in full prior to full energisation of the Proposed Development.
Env Health	No objections subject to conditions on a range of matters, eg noise, vibration, private water supply impact	No further action required. Conditions can be used	The Applicant agrees that a suitably worded planning condition should be inserted to control noise during the Pre-Construction and Enabling, Construction and Operational Phases of the Proposed Development.
Flood Risk Mgmt Team	Initially no objections (June 25) in principle, but works to Dochfour Weir not accepted as part of proposal, and which would require separate FRA. Further response (Aug 25) following request from ECU that the application should be assessed on the basis of a	Awaiting updated response from FRMT, which will also be informed by legal input on approach to this issue and SEPA advice on consenting process and status of water management body.	The Applicant has submitted a Technical Clarification in October 2025 to follow up on questions raised by both SEPA and THC Flood risk team. The Applicant believes that a suitably worded planning condition to cover the requirement for the installation and operation of a variable weir to control levels in Loch Ness is needed and would be happy to accept a condition on these matters. This could include the

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	variable weir being in place as the EIA is based on this scenario) - Modelling requires updating to include a range of flooding scenarios, clarity on winter operating of the weir with scenarios modelled, lack of clarity on the management board, including which body is responsible for day to day operation, ownership, inspection. Ongoing consideration of weir issues – (Nov 25) - Question of how control/responsibility of existing/new weir would pass from SSE to another body. Variable weir may bring flood risk benefits on River Ness, but assessment difficult due to number of assumptions being made. Further information required on establishment of management board, control of weir, change to CAR (EASR) licencing and competency of suspensive planning condition/s75 in respect of works to the weir – <i>Ongoing dialogue with FRM Team and SEPA on these questions, and discussion with Legal being arranged.</i>		requirement for a Water Management Board to be set up and for the Proposed Development to be represented for its operational life. Specifically on the questions raised in November 2025, the Applicant would note: <i>Question of how control/responsibility of existing/new weir would pass from SSE to another body:</i> The Applicant has held a kick off meeting with SSE, Statkraft and Scottish Canals to agree how a new weir would be constructed and operated. Following the kick off there has been further engagement with Scottish Canals on an MOA who are now co-ordinating with other parties on the same terms as GEE. The proposal is that as part of the variable weir design, control over the existing SSE sluice gates would be transferred to the new weir operation (via a further CAR application/amendment), such that the sluice gates operation would be a part of the integrated variable weir operating design. SSE has confirmed their interest in such an approach as they would consider the alternative, where SSE has operating responsibilities having to mitigate another entity’s operational risks at the Ness Weir, regardless of any mitigation measures proposed to be unacceptable, as noted in their response to the Loch Kemp PSH S36 Application (ECU00003398, Representation 112 dates 23rd February 2024). <i>A variable weir may bring flood risk benefits on River Ness, but assessment difficult due to number of assumptions being made:</i> The Technical Clarification submitted by the Applicant in October 2025 provided additional details on how the combination of the variable weir and additional PSH on Loch Ness would provide flood risk benefits for the catchment. <i>Further information required on establishment of a management board, control of weir, change to CAR (EASR) licencing and competency of suspensive planning condition/s75 in respect of works to the weir:</i> The Technical Clarification submitted by the Applicant in October 2025 sets out further detail on the CAR licensing process and how flood risk controls and operational parameters would be secured through that regime. Further updates have also been provided by Scottish Canals, confirming that following their most recent board meeting and the Scottish Budget, a Memorandum of Agreement (MoA) is now being prepared to support engagement with PSH developers on the modernisation of the Dochfour weir. In addition, details on the intended approach to governance, including the establishment of a Water Management Board and the control of the Dochfour weir, are available and can be provided if required. However, the Applicant considers that sufficient information has already been submitted to allow the Flood Risk Management Team to assess the feasibility and robustness of the proposed approach, and that there is a reasonably achievable and deliverable pathway to implementing the proposed weir modernisation works in line with the mitigation set out in the application. SEPA has since came back on the 21 January 2026 noting it can provide revised formal advice which will, based on above, withdraw its objection to the application on flood risk grounds if (1) the section 36 consent does not give any form of permission to the related weir works or establish the principle of it, and (2) subject to a stop generating condition. SEPA will also likely highlight that the flood risk implications of the weir mitigation works have not yet been full assessed and it is considered to be at the developers own risk should it subsequently be determined that the weir works cannot be designed in such a way as to avoid increasing flood risk (and as a result are not acceptable to us) or it’s not possible to gain the relevant related authorisations or mechanisms to form the required management body. To be successful the overall project does however still need to gain planning permission

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			for the weir element and secure a suitable legal mechanism to set up the management board required to run it. SEPA suggest that the developer discusses this directly with the planning authority (if they have not done so already). Further consideration needs to be given to the flood risk assessment element of this part of the development, which should be based on the advice SEPA have already given.”
Historic Env Team	No objections	No further action required	Noted
Transport Planning	Transport Scotland to comment on suitability of A82. Predicted peak daily figures appear low and are predicated on several assumptions that may not transpire eg all aggregate sourced on site, lower control works can be built as a marine project, with no road traffic, worker’s camp trips all by filled 12 seater mini-bus. Peak figures likely to be much higher and need revisited and informed by contractor input	Further information required and dialogue with Transportation on Transport Plan to provide more certainty on figures and ability to control vehicle movements in the manner proposed.	The Applicant has provided a Technical Clarification to the THC Transport Planning Team, issued on 22 September 2025, explaining why the forecast traffic figures for the Proposed Development are materially lower than those of comparable pumped storage hydro schemes. In summary, the lower traffic profile arises from embedded design and construction principles, including the internal circulation of construction materials within the Site boundary, comprehensive on-site sourcing and processing of aggregate to different grades (rock, gravel and sand), adoption of a marine construction approach for the Lower Control Works using the Caledonian Canal and Loch Ness, and the provision of a self-sufficient on-site workers’ village with managed transport arrangements. These measures are design-led to reduce transport in the area; rather than assessment assumptions and underpin the assessed traffic envelope. The Applicant remains committed to ongoing dialogue with Transport Scotland, THC Roads and Transportation Team and local communities. As it stands, an Outline Traffic Management Plan (TMP) has been submitted with the Application, and the Applicant agrees that a planning condition requiring a detailed Construction TMP to build on the principles in the Outline TMP, prepared with contractor input and agreed prior to commencement of the Construction Phase.

Key External consultee Issues

External consultee	Summary of response/s	Next steps	GEE Response
Buglife	Object – inadequate assessment of impacts on terrestrial invertebrates due to lack of surveys and inadequate mitigation of impacts. Impacts on peat habitat. Following FEI further response (Oct 2025) “No assessment is provided, based on evidence, of how water fluctuations will impact these communities and the resulting wider eco-system impacts. The evidence we have presented in our comments highlights that there are likely to be adverse impacts, that will lead to overall biodiversity loss from the proposals.”	FEI or detailed response from Applicant to issues raised.	The Applicant has provided Additional Information in August 2025. This Additional Information clarifies the survey work undertaken and reported in the EIAR. It also provides Additional Information on further survey works that took place around the time of the Application, that were not included in the EIAR. The results of these further surveys do not change the overall conclusions for aquatic ecology as presented in Chapter 9: Aquatic and Marine Ecology of the EIAR. However, they do demonstrate that those conclusions were indeed robust. The Applicant would be happy to accept a planning condition requiring a Macro-invertebrate Management and Monitoring Plan, to be developed in consultation with NatureScot. This commitment would be integrated within the Applicant’s wider long-term biodiversity monitoring and reporting programme, which includes a ten-year post-construction monitoring period, as previously committed to the local Community Councils. The programme would include further baseline surveys in Loch Ness and periodic monitoring during the Construction and Operational phases of the Proposed Development, providing a structured and transparent framework for ongoing ecological oversight.
Jacobite Cruises	Objection - concerns about hydrogeological and socio-economic impacts. <i>Applicant has been engaging directly with JC since objection to try and resolve concerns</i>	Developer has responded to JC comments, and understand there is ongoing dialogue. It may be helpful to seek an update from JC on whether GEE are able to address their concerns	The Applicant has been working with Jacobite Cruises, having met them in May 2024 and June 2025, along with subsequent email correspondence to understand their needs and are committed to continuing this dialogue. As it stands Jacobite Cruises is working internally to finalise an engineering proposal with initial proposals put to the Applicant for consideration and dialogue. Furthermore, the Applicant anticipates them being represented on the proposed Water Management Board to ensure their requirements are built in.
Mountaineering Scotland	Concerns about visual and landscape impact of development on mountain environment, in particular drawdown scarring and non-natural appearance of headpond and associated	FEI or statement in response that can describe currently proposed or additional mitigation to reduce visual impacts of	The Applicant has supplied Additional Information (A1.3 and A1.4) that shows the photomontage at Year 1 with drawdown water level and Year 15 top water level.

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	infrastructure when viewed from Meall Fuar- Mhonaidh	headpond and associated works, and in particular deal with drawdown scarring	
NatureScot (Partial response)	Objection Seasonal variable weir could affect River Moriston (Atlantic salmon and fresh water pearl mussels) SAC, Urquhart Bay SAC (alder woodlands) (advice TBC on impact on North Inverness SPA). Further information sought on consenting, implementation and management of variable weir and on inundation levels of alder woodlands, but not guaranteed this will resolve objections. Risk that a negative suspensive condition in respect of implementation of variable weir is not enough to give a competent authority sufficient certainty that the required mitigation will be implemented when they carry out their appropriate assessment. Peatland restoration of 1250Ha requires to be provided <i>Recent input from ECU to Applicant on the matters raised by NS in respect of demonstration/ assurance from stakeholders/consenting authorities that the variable weir can be consented – ECU comments: “It is not for Scottish Ministers to demonstrate possible consent particularly as they relate to applications outwith the Section 36 application, which would not fall to Scottish Ministers to determine. Any conditions of consent, if granted, would have to meet the planning tests and be relevant to the development.”</i>	FEI has been requested by NS in respect of the objection points. GEE presumably working on this. Noted that other issues may still be raised by NS eg on North Inverness Lochs impact. Also noted that they cannot guarantee that their existing objection points can be fully addressed. Questions about procedural arrangements around implementation of the variable weir overlap with the same issues being raised by SEPA and THC FRMT.	The Applicant has been engaging with NatureScot to clarify the information required to support the Habitats Regulations Assessment for European sites potentially affected by the Proposed Development. Meeting Update (3 December 2025): The Applicant met with NatureScot to agree a clear technical pathway to address the outstanding objection points. It was agreed that the issues relating to the proposed mitigation and how this might be secured through condition should be addressed separately. The Applicant is preparing further information pertaining to such a condition to address the concerns related to both the Habitat Regulations and with respect to suspensive condition concerns. River Moriston SAC (Atlantic salmon and freshwater pearl mussel): NatureScot confirmed that further information is required to demonstrate, at an in-principle level, that an appropriate fish passage solution could be delivered in association with the seasonal variable weir. The Applicant is therefore preparing a concept fish pass design using an expert consultant to address this point. This will ultimately result in the production of a Functional Ecological Performance Specification for installation at the variable weir. The Applicant would then use this reference specification as part of the discharge of any condition agreed to secure the work on the Dochfour Weir. Fresh Water Pearl Mussels A further point was raised by NatureScot in relation to Fresh Water Pearl Mussels at the mouth of the River Moriston, and the Applicant is currently addressing this point. With this work, the Applicant expects to be able to demonstrate that it can operate without adverse effects on the Moriston SAC site integrity. This will be submitted as Additional Information in Feb/Mar 2026, following further dialogue with NatureScot. Urquhart Bay Wood SAC: In response to NatureScot’s request for greater clarity on inundation effects, the Applicant has completed a LiDAR survey of the Urquhart Bay Woodland (SAC) area. An Additional Information data pack is being prepared presenting inundation extent, frequency and duration at defined intervals, assessed across seasonal conditions, to support the conclusions of the Habitats Regulations Assessment. North Inverness Lochs SPA: NatureScot does not object to this as it is believed there is no adverse effects on the integrity of the site. Peatland restoration: Separately, the Applicant confirms its commitment to delivering off-site peatland restoration, in line with the 1:10 ratio plus 10% enhancement. As set out in the Ecology response, suitable restoration opportunities are being progressed, and delivery is proposed to be secured through an appropriately worded negative suspensive planning condition, with details submitted via an Off-Site Peatland Restoration Plan. Variable weir delivery and certainty: NatureScot raised concerns regarding certainty where mitigation depends on delivery of a variable weir. The Applicant is therefore progressing a clear framework covering the design principles, consenting route, construction and operational management of the seasonal variable weir, in discussion with SEPA and THC Flood Risk Management Team. A further update on this framework will be provided in early 2026.
Ness District Salmon Fishery Board	Object – Impact on pathways for migratory salmon, impact on invertebrate ecology, impact of changes to Dochfour Weir on migratory salmon, impact on shoreside ecology due to drawdown,	Seek update from GEE on any ongoing dialogue with NDSFB, but may be difficult to overcome objection given their position has	The Applicant has received the objection from the Ness District Salmon Fishery Board (NDSFB), which raises a wide range of concerns relating to salmon migration, invertebrate ecology, drawdown effects, construction impacts, cumulative effects with other pumped storage schemes, visual impact, and the principle of pumped storage hydro as a technology in Loch Ness.

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	construction impacts on loch and river ecology, cumulative impacts with other PSH on loch environment, visual impact. Outdated storage technology and better alternatives exist. Objection reinforced following FEI (Sept 2025) submission – “The development will have irreversible ecological, and other, impacts of Loch Ness and the River Ness. The proposed modifications to Dochfour Weir will have significant impacts on the ecology, aesthetic and amenity value of the River Ness. These impacts should awaken wider concern within civic society in Inverness, and the Highlands, regarding the risks associated with subjecting iconic and sensitive environments such as Loch Ness to harmful pumps storage hydro developments on this scale.”	been re-asserted following submission of FEI	The Applicant notes that the objection reiterates a long-standing and consistently expressed opposition to pumped storage hydro development on Loch Ness. This position has been re-asserted following submission of Additional Information. The Applicant is therefore of the view that, given the ideological nature of the objection to pumped storage hydro in principle, it may not be possible to fully resolve or withdraw the objection through further Technical Clarification alone. Notwithstanding this, the Applicant is preparing a detailed technical response to the matters raised by NDSFB, coordinated through specialist ecological and fisheries advisers, which will be submitted in early 2026. This response will address the specific ecological pathways identified by NDSFB, including fish passage, drawdown effects, construction impacts and cumulative considerations, drawing on the Environmental Impact Assessment and subsequent Additional Information. Separately, and irrespective of the objection position, the Applicant remains open to constructive collaboration with fisheries interests on measures to protect and enhance salmon populations within the wider Ness catchment, including through monitoring, mitigation and enhancement initiatives secured through the consenting process.
RSPB	Object on potential impacts on Slavonian Grebe population (North Inverness Lochs SPA)	NatureScot advice will dictate our view on this – Still TBC	The Applicant notes the objection from RSPB in relation to potential impacts on the Slavonian Grebe population within the North Inverness Lochs SPA. NatureScot is the statutory nature conservation adviser for Habitats Regulations matters, and its advice will inform the competent authority’s assessment of SPA impacts. The Applicant understands that NatureScot’s advice on this matter is forthcoming and will respond accordingly once received. The Applicant remains open to discussing with RSPB further proportionate measures to protect and enhance breeding bird habitats and populations within the SPA, including, where possible, in collaboration with RSPB.
SEPA	Initial holding objection - maximum levels for generation should be lowered to prevent flood risk, or additional justification required on these levels. Objection also that impact on peat should be reduced by redesigning areas of infrastructure on peat reserves – No current change to flooding advice based on FEI submitted (Oct 2025) Ongoing dialogue with Applicant and THC on Dochfour Weir intervention, in terms of flood risk and on consenting and management of this. Questions remain unanswered to SEPA’s satisfaction	SEPA are still considering latest information from the Applicant on the weir as part of an ongoing dialogue through THC Planning. As noted, issues overlap with NS & THC FRMT on the process and jurisdiction around implementation of the variable weir and future management.	The Applicant awaits further information from SEPA and THC flood teams. Follow ups have been sent in January 2026 to both the ECU and SEPA requesting this advice and the Applicant awaits this information.
SSEN	No objections	No further action required, however SSE control the existing weir sluice gates and are likely to have a role in any change to existing arrangements	Noted. Discussions have taken place with SSE with respect to the existing weir sluice gates, and they have confirmed their interest in this operation being transferred as part of an overall variable weir operation, such that SSE would not maintain responsibility for the operation of the sluice gates in the case of additional PSH being active on Loch Ness. This approach is consistent with the variable weir approach proposed by the Applicant.
Transport Scotland	No objections	Would require to be party to any details/additional information submitted to address THC Transportation comments	As noted above, the Applicant has submitted an Outline Traffic Management Plan and considers it appropriate that this is secured through a planning condition to enable the document to evolve following further discussions with Transport Scotland, THC Roads and Transportation Team and local communities. Since submission of the Application, the Applicant has progressed discussions with the relevant Community Councils, and after meetings on 31 October 2025 has set out a series of proposed transport-related commitments intended to be captured through the Traffic Management Plan.

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			These include a commitment to investigate and progress a pedestrian safety improvement at Drumnadrochit Bridge, with a dedicated footbridge for pedestrians, cyclists and wheeling users identified as the preferred solution, subject to feasibility, land availability and statutory consents. In addition, the Applicant has committed to working with Glen Urquhart Community Council and THC to identify and agree a schedule of proportionate and deliverable mitigation measures along the A831, informed by community-identified pinch points and road safety concerns. The Applicant has also committed to supporting and participating in wider engagement with Transport Scotland and other stakeholders on A82 safety and resilience, recognising the importance of coordinated advocacy given the strategic role of the trunk road. The Applicant considers that these commitments demonstrate how the Outline Traffic Management Plan can be developed into a detailed and locally responsive Construction Traffic Management Plan, agreed with Transport Scotland and THC, and implemented in a manner that provides clarity, mitigation and community benefit during the Pre-Construction and Construction Phases of the Proposed Development.
The Woodland Trust	Object –Concerns about impact on ancient woodland and veteran trees have not been addressed.	GEE has provided a response on T objection that sets out scale and nature of mitigation.	Noted.

Objections - 46No. objections recorded on ECU website. Key objections and points summarised below:

Objector	Summary of objection	Next steps	GEE Response
Highlands Rewilding Ltd	The scheme will lead to a significant loss of biodiversity and is of a scale that is entirely inappropriate for the landscape.	THC would welcome GEE comments in response	The Applicant notes the objection from Highlands Rewilding Ltd, which asserts that the Proposed Development will lead to a significant loss of biodiversity and is inappropriate in scale for the landscape. The Applicant disagrees with this conclusion. The Environmental Impact Assessment and subsequent information demonstrate that the Proposed Development has been designed to avoid, reduce and mitigate environmental effects, and to deliver measurable biodiversity enhancement. In line with NPF4 policy, the Applicant is proposing to achieve a minimum 22% biodiversity net gain for area-based habitats, as set out in EIAR Appendix 7.5, using the SSER Biodiversity Toolkit, which is widely applied in Scotland and was agreed with NatureScot prior to submission. The Applicant notes that the objection raises a broad challenge to the principle, scale and role of large-scale energy infrastructure. These matters are addressed through national policy, including NPF4, which recognises the need for nationally significant renewable and energy storage infrastructure as part of the transition to net zero. The Applicant has covered the technical points raised, including aquatic ecology, water level fluctuations and peatland impacts, through the EIAR and Additional Information, and remains confident that the assessment framework is robust and proportionate. In addition, the Applicant has committed to a long-term biodiversity monitoring and reporting programme, following a proposal made by Foyers Community Council representative during community discussions. This commitment includes monitoring of Loch Ness during the Cconstruction phase and for a period of ten years following completion of construction, with the programme to be developed in consultation with NatureScot and with results reported publicly. The Applicant considers that this long-term monitoring commitment provides additional assurance that biodiversity outcomes will be transparently tracked in line with the mitigation and enhancement measures set out in the EIAR.
Wildfish Scotland	Impacts on trout and salmon resulting from construction works and operation of PSH.	THC would welcome GEE comments in response	The Applicant notes these comments and would highlight that the points made in relation to the NDSFB are similar to those of this consultee and as such those are addressed above.

Strathnairn CC	Significant impacts beyond application site, on its own or cumulatively with other PSH schemes. Short term impacts form construction on lives and businesses in locality. Long term impacts on flora, fauna, landscape, heritage and tourism	THC would welcome GEE comments in response and details of any ongoing dialogue with the CC	The Applicant notes the objection from Strathnairn Community Council, which raises concerns regarding construction impacts, cumulative effects with other pumped storage schemes, and longer-term effects on landscape, ecology, heritage and tourism. The Applicant has sought to engage constructively with Strathnairn Community Council following submission of the application, to offer clarification and discussion on the matters raised. The Community Council advised that it did not wish to meet and that it considered the submission of the planning application to mark the end of engagement. The Applicant notes that the Strathnairn Community Council area does not border Loch Ness and does not lie on the primary construction or traffic routes associated with the Proposed Development, with no direct traffic impacts anticipated within the Strathnairn area. Notwithstanding this position, the Applicant has undertaken statutory and non-statutory consultation in accordance with requirements and has assessed the issues raised through the Environmental Impact Assessment and subsequent Further Environmental Information, including cumulative effects, construction impacts and mitigation measures. The Applicant remains open to community engagement through appropriately structured mechanisms during the consenting and delivery phases, including via a Community Liaison Group, to be secured through a planning condition.
Stratherrick and Foyers Community Trust	Visual impact, noise, dust vibration during construction, cumulative landscape impact, peat loss, aquatic life impact, impact of water level changes, traffic on A82 and south loch roads, contrary to NPF4 due to environmental and social impacts	THC would welcome GEE comments in response and details of any ongoing dialogue with the CC	The Applicant notes the objection from Stratherrick and Foyers Community Council (not Community Trust), which raises a wide range of concerns relating to visual and landscape effects, construction impacts (including noise, dust and vibration), cumulative effects, peat and aquatic ecology, water level management, traffic on the A82 and south Loch Ness roads, and consistency with National Planning Framework 4 (NPF4). The Applicant has actively engaged with Stratherrick and Foyers Community Council and neighbouring Community Councils both prior to and following submission of the application. In June 2025, the Applicant wrote directly to the Community Council responding in detail to matters including biodiversity and biodiversity unit calculations, peatland restoration and monitoring, radon, lower control works delivery, blasting, noise, visual impacts, tree loss, aquatic ecology, water levels, cumulative effects, traffic, pollution and NPF4 compliance. A copy of this correspondence was consequently shared with THC and ECU on 7 October 2025. This engagement included a facilitated roundtable meeting held on 24 July 2025 at Fort Augustus Village Hall, chaired by Angus MacDonald MP, and attended by representatives of Stratherrick and Foyers Community Council, Fort Augustus and Glenmoriston Community Council, the Applicant's project team, and one local ward councillor, with all local councillors invited to attend. That session provided an opportunity for detailed discussion of community concerns relating to landscape and visual effects, construction impacts, traffic, water level management, biodiversity, cumulative effects and alignment with national policy, as well as to explain design evolution and mitigation measures already incorporated into the Proposed Development. This was followed by a further joint Community Council meeting on 31 October 2025 in Fort Augustus, involving representatives from Stratherrick and Foyers and Fort Augustus and Glenmoriston. The discussion focused in detail on operational and environmental matters, including Loch Ness water level management, hydrology and weir control, cumulative effects of multiple pumped storage schemes, biodiversity impacts and monitoring, construction impacts, and traffic and access arrangements. Particular emphasis was placed on the need for coordinated loch management, long-term and transparent biodiversity monitoring, and governance arrangements to ensure accountability over the operational life of the project. Measures discussed included long-term biodiversity monitoring and public reporting, materials reuse and on-site crushing to minimise traffic impacts, and the establishment of a standing forum for

			community liaison. These discussions have directly informed the Applicant's subsequent proposals for planning conditions and obligations and demonstrate ongoing, structured and solution-focused dialogue with the Community Councils on concerns or suggestions raised. The Applicant has subsequently set out a package of proposed planning conditions and obligations reflecting these discussions, demonstrating a willingness to secure proportionate mitigation and community-facing commitments through the consenting process. The Applicant considers that the issues raised have been assessed through the EIAR and Further Environmental Information, and that appropriate mechanisms are in place to manage construction and operational impacts. The Applicant will continue engagement through structured arrangements, including a Community Liaison Group, to be secured by planning condition, to support ongoing dialogue during the pre-construction, construction and operational phases.
Glenurquhart CC	Visual impact, impacts on Loch Ness itself, cumulative impacts along with other PSH scheme, impacts on wild salmon, other protected species and habitats, traffic impacts, lack of certainty over claimed socio-economic benefits, lack of community oversight	THC would welcome GEE comments in response and details of any ongoing dialogue with the CC	The Applicant notes the objection from Glen Urquhart Community Council, which raises concerns regarding visual impacts, effects on Loch Ness, cumulative impacts with other pumped storage hydro schemes, impacts on wild salmon and other protected species and habitats, traffic and access, socio-economic benefits, and community oversight. The Applicant has engaged with Glen Urquhart Community Council and the local community both prior to and following submission of the application and recognises that, given the scale and nature of the Proposed Development, ongoing engagement is essential to understand and respond to concerns and to identify opportunities to unlock wider community benefits. A planning condition is being sought to secure a Community Liaison Group, providing a structured mechanism for continued dialogue through the pre-construction, construction and operational phases. In early October 2025, the Applicant wrote directly to Glen Urquhart Community Council addressing both the overall merits of the Proposed Development and specific issues raised, including: • visual and landscape impacts; • water levels and aquatic ecology; • cumulative impacts with other pumped storage hydro schemes; • salmon and fisheries; • traffic and access; • ecology and protected habitats and mitigation; • governance arrangements, including the Community Liaison Group and Water Management Board; • monitoring and reporting; • socio-economic benefits and community wealth; • climate change and net zero policy; and • CAR licensing. This correspondence was shared with THC and ECU case officers on 7 October 2025. A meeting was held on 31 October 2025 in Drumnadrochit, supported by Angus MacDonald MP, to focus on Glen Urquhart specific concerns. Attendees included representatives of Glen Urquhart Community Council (Chair and Vice-Chair), Glen Urquhart Rural Community Association, and Soirbheas, the local development charity, alongside the Applicant's project team. The meeting provided constructive discussion on key issues raised in the objection, including traffic and road safety, cumulative impacts, Loch Ness water level management and governance, and construction logistics. A main focus was transport and resilience on the A82 and A831, where practical next steps were agreed, including: collaborative work to develop a consolidated and prioritised schedule of local road safety and active travel improvements between Drumnadrochit and the site access (drawing on community-identified pinch points and existing local information); progressing pedestrian safety measures at the A82/A831 junction, with a footbridge for pedestrians, cyclists and wheeling users identified as the preferred solution subject to feasibility and consents; and the Applicant's commitment to support the community's ongoing engagement with Transport Scotland and relevant ministers on the wider issue of A82 safety and enabling works. The meeting also included discussion on the workers' village concept and how it would function to minimise external travel

			demand, and on construction logistics including the intention to maximise on-site materials processing to reduce HGV movements. The Applicant considers that the matters raised have been assessed through the EIAR and Additional Information, and remains committed to continued engagement to resolve concerns where possible and to work collaboratively with the Community Council on mitigation and community benefit opportunities arising from the project.
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Other outstanding issues we feel the Applicant should provide more details on as part of THC Assessment

Issue	Summary	Next steps	GEE Comments
Questions on programming and assessment of impacts	Dividing assessment: The two -years Pre-construction and Enabling Phases appear to involve significant construction and therefore impacts assessment is divided into pre-construction/enabling phase and construction– which doubles the assessment but also reduces the numbers because it is two separate sets of impact figures. Should these all be treated and assessed as “construction phase” with impacts assessed collectively? There are differing dates for pre-construction/enabling and construction – eg 2 years/ 6 years and 3 years/5 years. The programme in Chapter 2 Table 2-6 sets out the preconstruction/enabling works over three years with main works starting in year four but the text says intense work i.e. main construction peaks years 2-4. The socio-economic Chapter 16 says preconstruction/enabling is two years. It would be helpful to understand if different assessments are using different time periods.	Seek confirmation from GEE on any conflicting statement in EIA on timing of works, and invite any further information/clarification on nature of “pre-construction and enabling works”. THC to them come to its own view on whether we agree with this split or not.	The Applicant notes the query regarding the distinction between the Pre-construction and Enabling Phase and the Main Construction Phase, and the use of these phases within the Environmental Impact Assessment. The Applicant confirms that the programme comprises: - a Pre-construction and Enabling Phase of up to two years, and - a Construction Phase of up to six years. The Pre-construction and Enabling Phase includes early works such as site establishment, access preparation, investigations, enabling infrastructure and advance works, which are materially different in scale, intensity and impact profile from the Main Construction Phase. For this reason, the EIA assesses these phases separately, in line with standard practice, to ensure that impacts are accurately characterised rather than aggregated in a way that could misrepresent peak effects. Where different chapters refer to slightly different durations or overlaps, this reflects: - the non-linear nature of large infrastructure programmes, with some activities overlapping phases, and - the need for topic-specific assessments (for example socio-economics, traffic or ecology) to focus on the periods of greatest relevance for that receptor. The Applicant considers that the assessments are internally consistent in intent and that impacts have not been understated as a result of the phasing approach.
Temp Workers' Camp	Is there enough details in travel plan to explain how worker's village transport will work? Are there journeys that are unaccounted for, eg staff coming and going in private cars at start or end of shift patterns, and for private journeys during their time at the camp, eg health appointments, recreational/social journeys. Can shuttle buses cover all transport needs of workers camp? Has the impact of 1000 workers on the local community and it infrastructure been fully assessed eg impacts on health, leisure etc	This point supplements that made by THC Transportation on the full impacts of the workers camp on the local community and traffic volumes of . Additional information is required on how the camp will operate both in terms of control of traffic but also how the workforce interacts (and impacts on) the local community and infrastructure, that this can be fully mitigated and that communities are fully involved in designing and monitoring arrangements and that mitigation meets their needs.	The Applicant notes the request for further clarity on the operation of the temporary workers' accommodation and associated travel arrangements. The Proposed Development includes a self-contained on-site workers' village, specifically designed to avoid pressure on local housing, health services and community infrastructure, and to materially reduce daily travel on the public road network. The accommodation will include medical, catering, welfare and recreational facilities, thereby minimising the need for off-site journeys during both working and non-working periods. Workforce movements will be managed in a manner comparable to a controlled industrial or offshore-style operation, with: - managed mini-buses services for workforce movements, with such movements based on leave cycles and not daily in nature; - restrictions on private vehicle use by accommodated staff with only local community employees permitted to use private vehicles for access to the site; - coordinated shift and rotation planning; and - enforceable controls secured through the Construction Traffic Management Plan (CTMP).

			The EIAR assumes that up to 20% of the daily workforce may undertake off-site movements, and this allowance explicitly includes: • start and end of shift or leave rotations; • movements of locally based staff; • management and specialist contractor travel; and • emergency or exceptional circumstances. This assumption is therefore not limited to daily commuting and represents a conservative envelope for assessment purposes. Compliance will be actively managed through the CTMP, including monitoring, reporting and adaptive measures should travel patterns approach or exceed the assessed allowance. The only personnel, with the exception of any employees from the local community, expected to travel regularly to and from local accommodation are the owner's engineering and management team, comprising fewer than 30 individuals, whose movements are already accounted for within the Transport Assessment. To provide additional certainty, the Applicant proposes a planning condition requiring a Workers' Village Strategy to be submitted and approved prior to commencement of the Pre-construction and Enabling Phase. This strategy will set out: • accommodation management arrangements; • workforce travel controls; • interaction with local services and communities; and • monitoring and governance mechanisms. The Applicant considers that, taken together, the on-site accommodation model, managed transport arrangements and secured strategy provide a robust and proportionate mitigation package, ensuring that the presence of a large construction workforce does not give rise to unacceptable traffic, housing or community infrastructure impacts.
Access roads /tracks impact	11.5km of roads to be built - Temp roads require 30m corridor and permanent require 50m LOD (100m buffer). 33 river crossings. More information on how much of 11.5km is temp/permanent.	More information on type of roads within the site and additional drawing/cross section/montage images of how landscape will be restored around temp and permanent road corridors	The Applicant notes the query regarding the extent and nature of access tracks, the balance of temporary versus permanent works, the construction corridor requirements, and the number and type of watercourse crossings. The Proposed Development includes a combination of permanent access tracks, required for long-term operational access (including to dams, spillway and UCW where practicable), and temporary access tracks, required to facilitate construction activities including access around the headpond and to temporary compounds. Temporary access tracks will be fully reinstated post-construction, except where they fall below the minimum headpond operating level. The layout and routing of access tracks at each stage of the project are clearly shown within the submitted drawings: • Figure 2.5 – Site Design: Pre-Construction Phase Plan; • Figure 2.6 – Site Design: Construction Phase Plan; and • Figure 2.7 – Site Design: Operational Phase Plan. Access track alignment and routing were developed having regard to peat depth, topography, hydrology and environmental constraints, and were informed through discussion with SEPA. In accordance with Chapter 15 (Geology, Soils and Ground Conditions), access tracks, compounds and permanent infrastructure have been located to avoid peat depths greater than 1.0 m wherever practicable. Where avoidance was not possible, alternative construction methodologies have been specified.

			In particular, floating access tracks are proposed in limited locations where tracks must cross deeper peat. These are illustrated in Figure 2.32 (Floating Access Track Detail) and are described in detail within Appendix 15.2: Outline Peat Management Plan (oPMP). The oPMP sets out: • anticipated peat disturbance volumes; • peat handling, storage and re-use methods; • reinstatement and restoration principles; and • alternative construction techniques, including floating track construction. Design principles draw on recognised best practice, including the “Good Practice During Wind Farm Construction” guidance, which, while developed for wind farms, is considered applicable to large-scale infrastructure projects in peatland environments with similar access track and ground condition challenges. Permanent access tracks require a temporary construction corridor of up to 30 m to accommodate two-way construction traffic, drainage and peat handling. Following construction, tracks will be reduced to single-track width with passing places, significantly reducing long-term landscape and habitat effects. Track alignments have been designed to follow natural landform where practicable. Watercourse crossings have been minimised through route selection and will be delivered in accordance with Controlled Activities Regulations (CAR) requirements, using appropriate crossing types (including open-bottom or bottomless structures where required). To provide additional certainty, the Applicant proposes a planning condition requiring submission and approval of: • a detailed access track and watercourse crossing schedule confirming which sections are temporary and permanent; • construction method statements, including peat handling and floating track installation; and • reinstatement and restoration details, informed by the oPMP. These details will be confirmed following appointment of the Principal Contractor and will be implemented in full.
Access to construction Lower Control Works	Some questions over feasibility of this being an entirely marine based operation, with little traffic impact on A82. Canal access plans are understood to be at an early stage and would likely require significant upgrading work to the canal infrastructure in advance – none of which is programmed. No water navigational risk assessment or explanation of how the loch would be used or proposals to construct a jetty. This takes the HGV figures off the construction assessment but how many barges are required, where would they come from and what is the impact on roads of the HGVs at that location?	In essence, the proposed arrangement could simply be a planning condition that the works are carried out as proposed, however given there are outstanding concerns about the feasibility of such large scale water based construction and waste removal traffic, further information is required on this. This could be from GEE but may need to show more firm commitments to carrying out whatever marine engineering works are required. Details of the scale and nature of marine traffic are light, and there is a question as to whether the full environmental impacts of this approach have been fully assessed. Any barriers to delivery of the proposed scheme will inevitably mean significant traffic impacts on the A82 and surrounding roads	The Applicant notes the questions raised regarding the feasibility and assessment of a predominantly marine-based construction approach for the Lower Control Works (LCW). The LCW has been designed from the outset to be delivered as a marine construction project, with equipment, materials and bulk movements transported via the Caledonian Canal and Loch Ness, thereby materially reducing project reliance on the A82 and A831. This approach is an embedded design principle and underpins the construction traffic profile assessed within the EIAR. The Applicant is actively engaging with Scottish Canals to confirm navigational access, construction logistics and interface requirements. The precise marine construction methodology, including the number and type of barges, loading locations, temporary works (such as pontoons or jetties, if required), navigational controls and associated risk management, will be finalised once the Principal Contractor is appointed. To address the concerns raised and to provide certainty to the Planning Authority, the Applicant proposes a planning condition requiring submission and approval of a Lower Control Works Marine

			Construction Strategy prior to commencement of LCW construction. This strategy would include: - confirmed marine access arrangements and construction sequencing; - details of vessels, barges and marine plant to be used; - navigational safety and risk management measures; - any temporary marine infrastructure required; and - confirmation of how this approach avoids or minimises road-based construction traffic. The Applicant considers this to be a proportionate and standard mechanism for a project of this scale, allowing detailed contractor-led solutions to be secured while ensuring that the LCW is delivered in accordance with the assessed marine-based approach.
Removal of soil	It is understood that 240,000m³ of excavated material (2.48% of total excavation volume) will be removed from the site, and the intention is that this is done by barge via the LCW. Would all the tunnelling spoil be moved back up the mountain and used in construction or would much more of it come out into the loch for removal? Related to previous point, if marine based transport is not in place, then spoil removal would significantly change no HGVs on A82 and connecting roads. A rough estimate is that 250,000m³ of material would equate to 16000 tipper loads	Further clarification on arrangements for handling waste on site and proposed removal arrangements – Tie in with points made above.	The Applicant notes the query regarding removal of excavated material and the implications for traffic on the A82 and connecting roads. The Applicant confirms that the majority of excavated material generated within the main site (including tunnel spoil) is intended to be reused within the Proposed Development, including for construction of the headpond embankments, thereby minimising off-site disposal requirements. However, the Applicant also confirms that the Lower Control Works (LCW) will generate an estimated c.150,000 m³ raw excavation (c.240,000 m³ bulked) of predominantly sandstone material. Due to the LCW location relative to the headpond works, this material is not currently assumed to be reusable for headpond embankment construction, as reuse would require transporting the material approximately 16 km via the public road network, which the Applicant considers undesirable from a traffic and transport impact perspective. Accordingly, the Applicant's stated approach is that the bulked LCW arisings would be transported off-site by water, via Loch Ness and, if not to a destination on the Loch, also the Caledonian Canal, either as a commercial product (subject to specification and processing) or as waste, with the final destination to be confirmed post-consent. Based on indicative assumptions, this equates to up to c.400 barge loads (assuming c.900 tonnes per barge), noting that the final number will be confirmed through detailed design and contractor methodology. The Applicant is aware of potential beneficial re-use opportunities within the region, including land reclamation and construction demand (for example, major infrastructure and port-related works), and will continue to explore viable reuse routes through the commercial supply chain as part of post-consent detailed planning and procurement. The marine-based approach avoids reliance on large-scale road haulage for LCW arisings; detailed arrangements (including marine logistics, handling, processing and destination) will be confirmed and secured through the proposed LCW Marine Construction / Materials Logistics Strategy prior to commencement of LCW works.
Landscape/Visual Impacts	We are not fully satisfied about visual impact of north facing side dam wall when viewed from Dores Beach? We would wish to see some more analysis and detail on the design and finish of the north facing side of the side dam to further assimilate it with the natural	FEI from GEE to show in more detail the design and finish of dam walls, the ability to shape landforms on the walls or in front of them (and any other mitigation) to soften the visual impact of the horizontal shape on the rugged	The Applicant notes the request for further detail regarding the appearance of the north-facing dam wall when viewed from Dores Beach. The Applicant notes that the effects on Viewpoint 7 (Dores Beach) have been comprehensively assessed within the Landscape and Visual Impact Assessment.

	form of the mountainside and ensure facing material is of appropriate material, tone, texture.	mountainside when viewed from Dores Beach.	This assessment concludes that, due to the distance to the Proposed Development (c.18 km), intervening landform and vegetation, and the limited proportion of the panoramic view affected, the operational effects would be minor adverse and not significant. While the LVIA recognises that Saddle Dam 2 would introduce a straighter edge to a very small part of the skyline at long distance, this effect is assessed as limited in extent and moderated by the scale of the surrounding landform, including Meall Fuar-mhonaigh. The dam design has been developed to a level appropriate for the EIA stage, and no significant adverse effects have been identified that would necessitate design change. As is standard practice, final detailing of materials and finishes will be addressed at detailed design stage. The Applicant considers that the visual effects identified at this viewpoint are already appropriately mitigated through the scheme design and assessed measures, however, there is scope for proportionate refinement through detailed design if required.
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