Response to Community Comments and Objection from Stratherrick and Foyers Community Council

Dear Mark and Sharon,

Thank you for facilitating our engagement with the Stratherrick and Foyers community, and for the opportunity to present at your community council meeting on 27th May, followed by the productive drop-in session on 10th June. We genuinely value the constructive dialogue we've had with community members and appreciate the time people have taken to engage with our proposals by raising important questions.

We were sorry to see the formal objection letter that was subsequently submitted to the Energy Consents Unit on 14th June. However, we recognise that this reflects genuine concerns within the community, and we remain committed to addressing these through continued engagement and transparent communication about our project.

This response document has two main sections: firstly, our detailed responses to the technical questions forwarded by email, following the 27th May meeting; and secondly, our response to the specific concerns raised in the objection letter. We hope this provides the clarity and additional information that the community is seeking at this time.

We would very much welcome the opportunity to discuss these points further, either through a dedicated engagement session or at a formal meeting of the community council if that would be more convenient for timing. Our Project Director, Martin Lacey (along with Peter MacDonald, who attended the last CC meeting) would be pleased to meet with you informally before your next community council meeting, scheduled for 7:00pm on 24th June at Stratherrick Hall - perhaps at 6:30pm - to discuss these matters without impinging on your formal meeting time. However, if an informal pre-meeting chat is not suitable, Martin and Peter would be happy to attend for a short session at the start of your formal meeting, if that would be preferable – we can be flexible to respect your time and we understand that this is quite short notice.

Our commitment to meaningful community engagement extends throughout the consenting process and, if consent is granted, throughout construction and operational phases of the project.

We believe that open dialogue and transparent communication are essential for projects of this nature, and we remain optimistic that we can work together to address concerns whilst delivering the significant benefits that Glen Earrach can bring, both meeting national energy needs and providing local positive socio-economic impact.

Glen Earrach

Section A – Response to open points from the community council meeting on 27th May (questions provided by email on 9th June)

1. Highland Council Biodiversity Enhancement Planning Guidelines

Question: Why is the Highland Council Biodiversity Enhancement Planning Guidelines (May 2024) not included among the policy documents referenced in the EIA?

Response: This arose from the timing of the guidance's adoption in May 2024, which occurred after our initial scoping engagement with The Highland Council. Upon review, we can confirm that our EIA addresses the substantive issues raised in this guidance, including biodiversity net gain, invasive species management, and waste/pollution management. Our approach strongly supports the guidance's biodiversity objectives through: (a) significant improvement of nature networks via large-scale native woodland planting schemes; (b) commitment to restore blanket bog to NatureScot's 1:10 compensation ratio guidance, including proposed onsite and offsite peatland restoration; and (c) full compliance with NPF4 and the Local Development Plan biodiversity policy. Where the guidance concerns local government actions and operations, these fall outside the scope of our project's assessment.

2. Biodiversity Unit Calculation Methodology

Question: Can the rationale for excluding land beyond the development boundary from baseline biodiversity unit calculations be substantiated?

Response: Yes, this approach follows recognised best practice and is consistent with methodologies used for Nationally Significant Infrastructure Projects (NSIPs) in England and Wales, along with renewable energy projects in Scotland as developers await further guidance from NatureScot on this topic. The calculation focuses only on areas directly impacted by the project's infrastructure (approximately 1.1 km^2 of non-bog habitat and 1.2 km^2 of bog) rather than the entire 49 km^2 red line boundary. This prevents artificial inflation of baseline biodiversity values that would lead to unrealistic compensation requirements. The red line boundary is necessarily large to accommodate design flexibility, but calculating 10% biodiversity net gain on unaffected areas within this boundary would result in disproportionate compensation demands. This methodology has been subject to legal scrutiny and is widely accepted as proportionate and robust.

3. Peatland Restoration - Helicopter Operations

Question: What is the expected frequency and flight path of helicopter operations for peatland restoration areas 56-62?

Response: The Outline Peatland Restoration Plan references helicopter use as a worst-case scenario for 10 areas totalling 17.24 hectares, based on distance from access tracks and challenging terrain. However, this is subject to refinement by the appointed restoration contractor following site inspection. The contractor will first investigate alternative approaches to minimise or eliminate helicopter use. If helicopter operations are confirmed as necessary in the final plan, flights would be few in number and of very short duration, with specific flight paths determined by the contractor based on safety and environmental considerations.

4. Peatland Monitoring Responsibilities and Timeframe

Question: What is the likely monitoring period for peatland restoration and who will be responsible?

Response: Monitoring will align with Peatland Action requirements as a minimum (10 years) and will be secured through planning conditions. Responsibility will be divided between on-site monitoring (undertaken by the estate) and offsite monitoring (undertaken by the landowner of offsite restoration area(s)). Our potential restoration partner, as a public body with a long connection to the land, is strongly committed to peatland restoration and would be expected to monitor and maintain restored peatland on its holdings on an ongoing basis beyond the initial 10-year period.

5. Radon Risk Assessment

Question: Given high radon levels in the Great Glen, has any radon risk assessment been undertaken?

Response: While the UK Radon map indicates some radon risk in the tunnelling area, this presents no risk to the public. Radon management during construction and operation will form part of the contractor's risk assessment procedures. There is an established track record for hydro projects in this region, and recognised good practice will be followed to ensure there is no risk to the construction teams or operational employees. Standard industry protocols for radon management in underground works will be implemented. A specific radon risk assessment will be undertaken during detailed design to inform appropriate mitigation measures for the construction and operational phases.

6. Lower Control Works Delivery and A82 Access

Question: (a) Please clarify the scope and methods of LCW delivery. (b) Can confirmation be provided that no supplies will be delivered via the A82?

Response: (a) Lower Control Works (LCW) construction is planned primarily from the loch side, with all major materials deliveries transported via the Caledonian Canal and then along the loch where possible. We do plan a marine works staging point (expected to be located on the A82 between Drumnadrochit and Invermoriston) for the purposes of people access to the works (by boat) and for staging of equipment transported along the loch. (b) We cannot confirm that no supplies will use the A82, as materials will be delivered to the main site via the A831, which connects to the A82. However, the primary delivery route will be via the A831 to minimise impacts on the A82 corridor south of Drumnadrochit. All traffic volumes and routing will be addressed in detail within a Construction Traffic Management Plan (CTMP), subject to planning conditions, to ensure appropriate mitigation measures are in place.

7. Blasting Programme Timing

Question: (a) Which six months constitute the "quieter season" for blasting? (b) What guarantees limit blasting to this period?

Response: Where we have the option and it is reasonably practicable to do so, we are committed to scheduling noise-generating works (including piling and blasting) at the Lower Control Works to be at times of the year and times of the day which will have minimal impact on local receptors, being aware of the tourism significance of Loch Ness. This will include avoiding noisy works early in the morning, late at night, or on Sundays. These restrictions will be controlled through planning conditions and managed via the Construction Environmental Management Plan (CEMP). Although we note that an objection has been lodged (per Section B below), we remain open to further engagement with the community on this topic to minimise impacts. We are also committed to further optimising the construction approach to minimise piling where reasonably practicable, and we will keep the community updated on this as we develop the detailed construction designs for the works.

8. Marine Transport Noise and Operations

Question: (a) What are projected noise levels from tugs pulling barges? (b) How many tugs and barges will operate?

Response: Tug and barge operations are expected to involve a small number of vessels, typically one or two tugs operating intermittently during the construction period. Detailed operational noise modelling will be undertaken as part of the marine construction method statement. Vessels will be specified with modern design and high standards for emissions and noise profiles, bearing in mind the sensitivity of Loch Ness and the surrounding area. Noise levels will be managed in accordance with marine construction standards and mitigated to avoid significant disruption to receptors around the loch.

9. Additional Visualisations

Question: Can additional visualisations be provided from: (a) Upper Foyers (unobscured views), (b) Boleskine House/Foyers Lodge, (c) construction phase, and (d) night-time views?

Response: (a) An additional visualisation is being prepared from a location identified by The Highland Council (THC) with less vegetation obstruction. Though this location is not representative of the main Foyers property cluster, it is being prepared and provided to supplement the viewpoint assessment provided in the EIAR. Its provision does not change the outcome of the existing assessment and is being provided to THC as a visual tool to assist in their assessment of the application. The visualisation will be provided to the Energy Consents Unit (ECU) as Supplementary Environmental Information in early course. The ECU will notify consultees of receipt of this further information, and it will be made available to view on the ECU application portal. (b) Representative viewpoint locations were agreed with THC and NatureScot through the LVIA process to represent receptor groups with theoretical project visibility. (c) Construction phase visualisations have not been requested by statutory stakeholders, though the LVIA assesses construction effects from all representative viewpoints. (d) Night-time photography and visualisations have not been requested by statutory stakeholders, though the LVIA assesses lighting implications during both construction and operation phases. Please note that there will be no permanently on lighting associated with the Lower Control Works, other than any minimum water navigation lighting which may be specified as a condition for the works.

10. Tree Loss and A82 Visibility Impact

Question: (a) Why doesn't tree loss appear in visualisations? (b) How will tree removal affect A82 views and usage?

Response: (a) Vegetation removal is shown in Viewpoint 13 of our visualisation suite. An objective of the design has been to minimise the removal of trees, and to avoid disturbing ancient woodland as far as possible. After construction, planting will be established to reduce any visual impact. (b) The vegetation removal shown in our plans and visualisations will open up views of Loch Ness for a short section of the A82 adjacent to the Lower Control Works, potentially providing enhanced scenic viewing opportunities for road users in this location. The project also has a significant amount of new forestry being planted within the Red Line Boundary (see below for more details).

Section B – response to letter of objection from 14th June, posted on ECU website on 16th June.

1. Visual Impact – During Construction and After

a. The area of woodland affected between the A82 and Loch Ness is relatively limited, it is a short strip of less than 1.3 ha. In total we anticipate less than 11 ha of woodland will be lost across the project and we are undertaking over 670 ha of compensatory planting within the Red Line Boundary. Local landscaping measures will help naturalise the Lower Control Works area, which includes the use of natural materials here and local planting.

b. The LCW is a low-profile structure designed to sit below the level of the A82 and will not have installed generating machinery, unlike other existing or proposed schemes in Loch Ness. There may be some understandable conflation with other schemes involving shoreline infrastructure, but Glen Earrach differs fundamentally in both scale and visual treatment, as we are locating the powerhouse and its equipment underground.

c. The proposed access structure from the A82 will be a low-profile jetty-like structure that will follow the natural slope down to the loch, using materials selected to blend with the hillside and shoreline context. It will not be a scar on the hillside.

d. There is no plan for permanently on artificial lighting. Lighting will only be used when the LCW is accessed for reactive maintenance or inspection, which will be rare as this area is a passive structure that will be unmanned, and any scheduled maintenance will be done during the day. The only other lighting proposed is navigational marking on the smolt screen, which will be minimal and in keeping with marine safety requirements.

e. The viewpoints used in the visual impact assessment follow guidance from The Highland Council and NatureScot, please also see the response to point 9 in Section A above.

2. Noise, Dust, and Vibration

We understand that noise is a concern and acknowledge the importance of maintaining tranquillity in rural areas, and we also understand the concern about noise travelling across Loch Ness. It is not clear to us where the value of 80-90 dB has been taken from, the EIAR contains modelling of construction noise and vibration impacts. We are committed to working within The Highland Council's Environmental Health Officer's recommended limits of 55 dB LAeq,1hr during weekday daytime and Saturday morning periods, reducing to 45 dB LAeq,1hr on Saturday afternoons. Our assessment demonstrates that with mitigation measures in place, these limits can be achieved at the nearest residential receptors. This will also be managed through a likely planning condition.

Glen Earrach

3. Effect on Aquatic Life in Loch Ness

We have given comprehensive consideration to the aquatic ecology impacts from our project, as can be seen in the dedicated chapter 9 and associated appendices in the EIAR. This includes potential effects on salmonid migration routes from the River Moriston Special Area of Conservation. The design includes a smolt screen at the lower intake. We are also the only project to undertake a smolt tracking study, the results of which will be used to inform our Fisheries Management Plan, including curtailment of the plant operation during sensitive periods of smolt migration if required. For the construction period, mitigation measures are included in the CEMP and will be subject to SEPA and NatureScot oversight. We continue to engage with the Ness District Salmon Fisheries Board, NatureScot and SEPA to take advice on this topic, and they all helped to scope the smolt study that is being undertaken at the moment.

4. Water Level Impacts in Loch Ness

We have given comprehensive consideration to the water level impacts from our scheme, as can be seen in the hydrology and water environment chapters of the EIAR, and this includes cumulative effects. The high-head design of our project means that it can deliver a high energy yield while cycling substantially less water per unit of energy than other schemes. This reduces the scale of influence on Loch Ness water levels and demonstrates the efficiency advantages of our approach. It is important to note that all water taken from Loch Ness is returned to Loch Ness, and that we will not be pumping water out below an agreed minimum or returning it above an agreed maximum. Both of these limit values would be confirmed and controlled by SEPA by means of a Controlled Activities Regulations licence.

5. Cumulative Effects

We note the point about cumulative effects of energy projects, and we agree that a first-come first-served approach is inappropriate. We support an evaluation based on the most effective schemes which deliver the largest benefits with the minimal impacts. With the substantial hydraulic head advantage that our project has versus other schemes in the area, we use less water to deliver more energy and power than all the other schemes put together. This makes a strong case for our progression. We anticipate the UK Government Cap and Floor mechanism will undertake this comparative review for the enabling route to market mechanism.

6. Peat Disruption and Loss

The EIAR is quite clear about the impact on peatland/blanket bog of different depths. For every hectare of impacted blanket bog, there is a corresponding commitment to restore degraded peatland well beyond the originally impacted area, (NatureScot guidance for this is a 10:1 ratio), and this means there is a significant net benefit to the national peatland

condition. These restoration measures will be subject to planning conditions and ongoing monitoring, making them formal and enforceable commitments. We stand fully behind these commitments and view this as an opportunity to deliver a measurable national net gain in peatland condition and carbon sequestration.

7. Traffic Disruption on the A82 and Southern Roads

Our planning from the outset has had a strong awareness of the A82 as a critical transport link for the local area, and we're also aware of the knock-on effect to other roads like the B862 on the south side of Loch Ness if the A82 is impacted. We've amended our design following consultation with communities to reduce the impact there as much as we are able to, including moving the construction of the Lower Control Works to a waterborne operation, and relocating the main access to the A831. In regard to drilling beneath the A82, there will be approximately 25 metres between the level of the road and the top of the waterways, which is significantly above the top cover level that would be a concern for tunnels of the diameter that we are proposing. A Construction Traffic Management Plan (CTMP) will be developed in consultation with The Highland Council's Roads and Transport Planning team to ensure road safety and minimise disruption throughout the construction phase and again we expect this to be a planning condition.

8. Pollution of Loch Ness

We fully understand that Loch Ness is globally iconic and ecologically sensitive, and we take the protection of this unique ecosystem extremely seriously. Whilst we acknowledge that pollution risks exist on major infrastructure sites, our project incorporates comprehensive, multi-layered pollution prevention measures, specifically designed to protect Loch Ness.

Works on Loch Ness will be governed by strict marine construction protocols. All construction vessels will operate under MARPOL regulations with shipboard oil pollution emergency plans and onboard waste disposal facilities. Material excavated from Loch Ness will be retained on the shoreline to prevent contamination spread, with silt curtains and settlement systems controlling sediment during dredging operations.

Immediate safeguards include real-time water quality monitoring, 24-hour pollution incident response teams with direct SEPA hotline access, and an Environmental Clerk of Works supervising all loch-based activities that will form part of a planning condition. All refuelling will occur in designated bunded areas positioned well away from the shoreline, in line with good practice guidance from SEPA.

Regulatory oversight ensures all loch-based construction activities operate under detailed method statements pre-agreed with SEPA, subject to continuous environmental auditing.

These measures form part of our binding Construction Environmental Management Plan, recognising that protecting Loch Ness is essential not only environmentally but for Scotland's tourism economy and public confidence in major infrastructure projects.

9. Compliance with National Planning Framework 4 (NPF4)

We agree that NPF4 should be used to guide appropriate development, and we have worked hard to align our project with the guidance. Our project has been designed with reference to multiple NPF4 policy areas:

Policy 4 (Natural Places): Full ecological surveys and mitigation planning undertaken for all locally and nationally designated features;

Policy 5 (Carbon-rich soils and peatlands): Peatland disruption minimised; significant offsetting restoration commitment secured by planning condition;

Policy 11 (Energy): Project offers a uniquely efficient storage solution with high energy yield and reduced impact due to its high-head configuration;

Policy 20 (Blue and Green Infrastructure): Careful integration with aquatic environments, supported by hydrological modelling and water quality safeguards.

Lastly, it is important to recognise that the policy context strongly supports the development of Pumped Storage Hydro in Scotland. This includes NPF4 where it is recognised that Pumped Storage Hydro is a significant development of national importance that will help to deliver the spatial strategy.

Glen Earrach

Closing remarks

In totality, our project represents a balanced and well-justified proposal in line with national policy, enabling Scotland's net zero transition while protecting critical environmental and community interests.

We hope this response demonstrates our commitment to addressing the community's concerns through explanations where we can and our willingness to engage constructively on all matters raised. We recognise that major infrastructure projects inevitably raise legitimate questions and concerns, and that is particularly the case for communities around Loch Ness. We also believe that transparent dialogue and robust environmental safeguards are essential for successful project delivery.

Our project has been designed from the outset to deliver significant renewable energy benefits; whilst minimising environmental impact through innovative engineering solutions, comprehensive mitigation measures, and substantial biodiversity enhancement commitments. We remain confident that the project represents an appropriate balance between the urgent need for clean energy storage and the protection of the unique environment around Loch Ness.

We very much look forward to continuing this dialogue with the community, whether through Martin's attendance at your meeting on 24th June or through subsequent engagement opportunities. Your input remains valuable to us as we work towards a project that can deliver national energy benefits, whilst respecting local environmental and community interests.

Thank you again for your time and consideration in reviewing our responses.

Yours sincerely,

Glen Earrach Energy Project Team